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City and County of San Francisco

Department of City Planning

Environmental Impact Report

THE DOWNTOWN PLAN

Draft

Volume 3: Summary of Comments and Responses

EE81.3

Part 2: Comments

September, 1984

DRAFT EIR PUBLICATION DATE: March 16, 1984
PUBLIC HEARING DATES: April 26, 1984 and May 3, 1984
PUBLIC COMMENT PERIOD: March 16, 1984 through June 4, 1984

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CITY PLANNING COMMISSION

CITY AND COUNTY OF SAN FRANCISCO

Public Hearing on the)
Draft Environmental)
Impact Report for the) No. 2. EE81.3
Downtown Plan)
)

Thursday, April 26, 1984
1:15 o'clock p.m.
Board of Supervisor's
Chambers
City Hall
San Francisco, California

Reported by:
RICHARD S. ADAMS

Adams
Convention Reporting

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(415) 472-0350

PLANNING COMMISSIONERS PRESENT

Toby Rosenblatt, President

Dr. Yoshio Nakashima, Vice President

Susan Bierman

Norman Karasick

Jerome Klein

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Douglas Wright

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THURSDAY, APRIL 26, 1984 1:15 O'CLOCK P.M.

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PRESIDENT ROSENBLATT: The next item to be called is the Public Hearing on the Draft EIR for the Downtown Plan. If you expect that you will want to address the Commission on this matter, there are sign-up cards there at the microphone which we would ask you to fill out and give to the Secretary who will periodically come over and pick them up there.

As indicated in the notices that have gone forward with the calendar this week, last week, perhaps a week before -- I don't remember, because we anticipate a number of speakers, the Commission will ask each speaker to organize his or her comments in such a manner that they can be presented in a period of time not to exceed 15 minutes.

As is always appropriate and welcome by the Commission and the Department, if you have comments on the Draft EIR, we would appreciate it if you could submit those in writing as well as verbally. If they are comments that take more time or more complexity than you can cover in the time of the public hearing, they will be indeed best able to be addressed by the staff if you can also provide a written document, and we will have a few comments in a moment about the anticipated calendar or timetable for the balance of the hearings with respect to the Downtown Plan.

All right. Item 2, please.

SECRETARY WOODS: Item 2 is a public hearing on the Draft Environmental Impact Report for the proposed Downtown Plan.

PRESIDENT ROSENBLATT: All right. Bob?

MR. PASSMORE: Mr. President, members of the Commission, the President has requested staff to give you what we would anticipate is a schedule of public hearings dealing with the Downtown Plan and the environmental evaluation involved in it.

As the Commission will recall, you commenced hearings on the Downtown Plan in January of this year. This is the public hearing on the Draft Environmental Impact Report today. And the Commission indicated an ability to have time after this hearing within the next week to have any follow-up hearing on the Draft Environmental Impact Report.

The material that went out with the Draft Environmental Impact Report had indicated that the end of the public comment period would be May 3rd. The Commission has, however, received notification by the Board of Supervisors' resolution requesting a 30-day extension of the comment period. If that were to be approved or if that request is granted by the Commission, that would mean the comment period would end at the end of the day on June 4th.

We have also calendared a public hearing, a special public hearing, that would deal with the preservation proposals and significant building list for May 22nd. We would anticipate on June 7th to place before the Commission, Downtown Plan revisions. This would be a presentation, not contemplated as a public hearing. June 28th we would propose scheduling a public hearing on the Master Plan changes in the Downtown Plan Ordinance. We would contemplate towards the end of June or early July to have completed the responses to the comments received on the Draft Environmental Report and be able to distribute those responses in July, and on that schedule would anticipate that the Planning Commission would be prepared to certify the Final EIR in early, mid-August, which would then allow the Commission to proceed to considering amendments to the Master Plan, perhaps initiation of interim controls to take over for the present moratorium on hotel and office space that will run out on August 27th, and to make recommendations to the Board of Supervisors for final downtown controls.

Those would be our current thoughts on the schedule that you should anticipate during the following months. Miss Sahm has -- if you have any questions --

COMMISSIONER BIERMAN: One question. Could we have a copy of that for next week, maybe? I didn't get those taken down. So could the Commission be given a copy of that schedule?

MR. PASSMORE: Yes.

COMMISSIONER BIERMAN: The other thing --

MR. PASSMORE: Sorry, Commissioner. Part of that is, of course, dependent upon the Commission making the decision that the comment period would not end on May 3rd but, rather, the latter date. Because the earlier schedule we had with the May 3rd date had anticipated completing some of steps at an earlier stage in time.

COMMISSIONER BIERMAN: I didn't hear in your presentation that we are also having a hearing next week. Mr. Chairman, isn't that correct?

MR. PASSMORE: I indicated that the Commission had indicated that they they felt they could be available for an additional hearing. I have not made that because I think it's a determination the Commission has to make.

COMMISSIONER BIERMAN: Well, I guess I am confused, because I thought that is what we announced to the public last week, that we would have a meeting next week at the end of our regular day. And I know that some people have told me that they're planning to come next week, not today.

PRESIDENT ROSENBLATT: I think we can deal with that today. I had thought what we said was that we would hold our individual calendars to be available the evening of May 3rd for a hearing that might start after the dinner hour, If it appeared after today's hearing that there was still substantial testimony that was remaining and we didn't have a chance --

COMMISSIONER BIERMAN: That was not my understanding.

PRESIDENT ROSENBLATT: We can make a determination after any time today that you all wish as to whether we need that hearing on the 3rd of May.

At this juncture it would be appropriate, if the Commission so wishes, for the Commission to have a motion with respect to the formal comment period closing date for the Draft EIR. As suggested, it's now published on the cover of the Draft EIR to be April 30th. The date suggested is now June 4th of 1984.

COMMISSIONER BIERMAN: So moved.

COMMISSIONER WRIGHT: Second.

PRESIDENT ROSENBLATT: Moved and seconded. All those in support? Those in opposition? It's adopted unanimously. All right. Barbara?

MS. SAHM: Mr. President and members of the Commission, the item you have before you for hearing today is the Draft Environmental Impact Report on proposed controls for downtown. It includes the Downtown Plan, which was published by the Department in August, 1983, and five alternative zoning and planning scenarios as well. The Draft EIR analyzes the Downtown Plan in depth. The other five alternatives are covered in detail in a document that we regularly refer to as "the consultant's report," with detail remaining there and summarized in this Draft EIR that you have before you today, but incorporated by reference in that Draft EIR.

The consultant's report has been available since the end of May, early June last year. And the analysis of the Downtown Plan follows a similar format and a similar or the same methodologies. So the information is not as new to you as it might have been at any other ordinary EIR.

I am available for questions if the Commissioners have them right now. I don't propose, however, that we answer questions or comments as they come up. We have a court reporter here who will be taking all this down, and the staff will be preparing written responses, as we normally do for any other EIR, during the next few weeks or months.

PRESIDENT ROSENBLATT: All right. Are there any Commissioner questions at this point? All right. We will begin now with public testimony. The first speaker is Commissioner Ramey.

MS. RAMEY: Mr. President, members of the Commission, my name is Drucilla Ramey, and I am the Chair of the Commission on the Status of Women of San Francisco. **Z.1**

The Commission was established in 1975 to enhance equal opportunities for women of our City and to eliminate barriers which have denied equal opportunity to our women. The Commission has long been involved in the area of attempting to secure equal employment opportunity in San Francisco, and we have been particularly concerned with three issues: Sexual harassment in employment, equal pay for work of comparable worth, and childcare. **Z.1**

We are very anxious that in the area of childcare we obtain the recognition by developers, by employers, and by planners that childcare needs of working parents must begin to be accommodated in the workplace, including on-site childcare. **Z.2**

I am here to speak on behalf of the Commission and on behalf of the Childcare Law Center. We want to thank the Commission for its interest in the childcare area. Representatives of the Childcare Law Center and of our Commission have met with President Rosenblatt, and representatives of the project have met with -- frequently -- with members of the staff of the Department to try to develop a proposed amendment to the Downtown Plan which would accommodate the need for childcare in new development in downtown San Francisco. **A.1 Z.2**

Much, of course, remains to be done. And I am really here today to thank you for the work that you have done with us already and to encourage you to continue that work in the development of accomodation for childcare in downtown San Francisco. **Z.2**

Anything at all that our Commission can do or that the Childcare Law Center can do, we are very anxious to do, and we have a lot of people who would like to continue participating in this matter. **A.1 Z.2**

Thank you.

PRESIDENT ROSENBLATT: Thank you. The next speaker is Robert Tandler, to be followed by Norman LaForce, I believe it is. It is a little difficult for me to read.

MR. TANDLER: Mr. President, I have a single page handout which I wonder if I could distribute to the distinguished members of the Commission which may facilitate my short presentation today. Z.1

Mr. President, members of the Commission, my name is Robert Tandler. I am from the Law Offices of Harold S. Dobbs, and I am here on behalf of my wife today, who is President of Fritzi of California, a California and San Francisco corporation, and who, unfortunately, cannot be here to attend today because of the pressing urgency of her business. Z.1

I would like to start my presentation today with a short explanation of who Fritzi of California is, because I think the fact that the lack of our identity and the lack of our participation in the planning process has resulted in a proposal which portends to put Fritzi of California out of business. Z.1

Fritzi of California has been manufacturing and distributing women's, missy and junior sportswear and casual wear in San Francisco for 38 years. We have become the 76th largest publicly traded corporation in the State of California, employing 350 people in San Francisco alone; and through the network of 95 independent sewing contractors who sew the nine million garments annually produced by Fritzi of California, indirectly create jobs for an additional 2500 people, most of whom are minority workers and a great portion of whom are elderly, and a significant majority of whom are women. Z.1

Fritzi has expanded its sales out of San Francisco South of Market from its beginnings 38 years ago to $65 million a year. We expect it to grow to $70 million this year, and we hope it will grow continually, especially with your good help. Z.1

Fritzi is located at the corner of First and Howard, directly south of the Transbay Terminal, where it keeps its current corporate, financial, and sales headquarters. On the square block south of Howard, between First and Fremont Streets, Fritzi utilizes all that space for its merchandizing, factory outlet, public retail stores, storage and warehousing, fabric and trim storage, cutting department for salesman samples, and the distribution center to the independent contractors who do the sewing in San Francisco. Z.1

Its third property is located between Tehama and Clementina on Second Street, where Fritzi distributes all of its garments that it sells nationwide from its San Francisco base. Z.1

Essentially this constitutes a production and manufacturing triangle which is dependent upon all three legs for the success and continued operation of this corporation in San Francisco, the lack of any one of which will result in the triangle collapsing in on itself, and either the liquidation of the company or its relocation out of San Francisco. Z.1

The handout that I have given you highlights in green the proposed park south of the Transbay Terminal, south of Howard Street between First and Fremont where all of the distribution to the independent contractors currently takes place. If that becomes a park, then there is no distribution to 2500 employees in San Francisco. B.6

Realizing that the specific purpose of today is to comment on the Draft Environmental Impact Report, I will limit my comments to that report specifically and hope that now that we have become aware of the proposed plans, we can become a part of the planning process and work with you to develop alternatives that will meet your objectives without putting us out of business. Z.1

In Section IV.B of the Environmental Impact Report it is stated that, "It is the strategy of the Downtown Plan to redirect office development in a southerly direction and east of Yerba Buena Center," specifically Subarea 2 in the C-3-0 SD division. If one full square block of that small area is devoted to a park, then there is a distinct conflict between the stated objectives of the Downtown Plan and its open space objectives. **Z.1**

Utilizing valuable potential of development space without recognition of the needs for further development in that area and utilizing that space as a park without the possibility of other uses for that space is in direct conflict with the stated objectives of the Downtown Plan, a fact which the EIR fails to present. **B.6**

There are other alternatives. We propose that it is possible to develop and incorporate open space into on-site development and on-site open space which would result in lowering the impact on public funds for acquisition, which would continue to meet open space goals. And we propose, as owners of that land, that we would wish to work directly with City government to achieve the goals of development and open space alternatively. I think we can all look to the development that Levi has achieved in the north section of San Francisco, downtown area, to see an example of what is possible. **B.6**

"As a part of the strategy to deliberately redirect major new development to Subarea 2," and I am quoting from the EIR when I make that statement. The EIR goes on to say that, "The Plan proposes to increase existing height limits in the area south of the Transbay Terminal," specifically our property. **B.6**

Unfortunately, as you can see from the map which is taken from the EIR that I have left with you this afternoon, the one piece of non-publicly-owned land in that area is currently set for an 80-foot height limitation. All the property surrounding it is set for height limitations that range from 200 to 350 square feet. **B.6**

The stated intention of limiting the height on that property to 80 feet is in direct conflict with the stated objectives of the Downtown Plan. If in fact it is the objective of the Downtown Plan to develop property so that higher, taller, thinner developments are achieved, by limiting that specific piece of property to an 80-foot limitation, it destroys the ability to develop that property in a manner to maximize open space and achieve economic land use. It would require development by any sensible owner of as much ground floor space as possible so as to maximize economic use. **B.6**

There is an alternative. The alternative is to work with the City to develop multi-functional property use, which includes existing uses, expanded uses in conjunction with the stated strategies for the Subarea 2 development, and open space. **B.6**

My law offices are located at One Maritime Plaza, which I believe is one of the finest examples of a combination of office space use and open space in San Francisco. And we propose that it would be possible, especially because almost this entire square block is owned by one entity, that a development of beautiful proportions of achieving open space alternatives and maintaining the existing uses of the property, which are very important to our company, and which we have chosen to do in San Francisco at that location, can be achieved. **B.6**

This corporation and its principals, who happen to be my family, are committed to this location in San Francisco. There are more economical places to live and work. We all know that. We see major corporations leaving San Francisco because of these reasons. But we have chosen this location in San Francisco because we want to work with the City and in the City to achieve our objectives of continuing operation in this location and the City's objectives of graceful development with ample on-site open space rather than squat, blocky buildings, which an 80-foot limitation would impose. **B.6**

We are currently discussing plans inside the company for a 300,000 square foot distribution center which we would like to locate where we are. **B.6**

Appendix G to the Downtown Plan states that, "It is assumed that most open space requirements would be met off-site. Due to strict regulation of acceptable on-site open space, only a few developers with prime sites and an interest in creating a unique building development would be willing to undertake the design expense and the long-term responsibilities of maintaining public access." **B.6**

We are San Franciscans. We are not developers. We are committed to the long-term growth of our company in our City. Nobody spoke with Fritzi of California about what might be done with that property. We don't know how it became a park. The Environmental Impact Report fails to address alternatives to leveling the existing use to rolling grassland as opposed to using parking lots which are across the street. The Environmental Impact Report fails to address the fact that there is a park proposed for publicly-owned land two blocks away, north of the Transbay Terminal. The Environmental Impact Report fails to address how this particular piece of property became the subject of an 80-foot height limitation, where every square inch of property on either side of it, with the exception of the freeway, has a height limitation which is three to four to five times as high. B.6

You might ask, "Why would you want to continue the existing use of the property where it may be more economic to move elsewhere or change it to prime office space?" This is not our objective. We have been in San Francisco for 38 years, employing blue collar workers and white collar workers, and we propose to continue. B.6

The Draft Environmental Impact Report at Section D discusses employment and notes that 46 percent of the city-wide industrial, manufacturing, and mining operations and jobs are located in the C-3 District. We employ ten percent of those people. Fritzi's sewing requirements create 2500 jobs outside the company for the 95 independent contractors. The proposed park block is the precise location wherein these independent contractors' jobs are created. There is no other space available to us wherein we can distribute the fabric and create the fabric and create the patterns that are shipped to these independent contractors. If we have to move out of San Francisco, we will have to seek sewing elsewhere, closer to where it will be distributed from. **B.6**

The EIR fails to address the effect of removing these facilities from service on business or the impact on the City from the loss of revenues by driving this corporation out of the City -- or out of business entirely -- and the demand on City coffers for assistance to the number of people, including the elderly, who might very well be untrainable in the event that they're put out of work, many of whom are Soviet emigres. We have been told by the Jewish Community Federation that we are the single largest employer of Soviet emigres in the City of San Francisco. **B.6**

Fritzi of California is a leader in the growing San Francisco fashion and garment industry, which is nobly led by, I think, Levi, Fritzi of California, Esprit de Corp. It would be a conflict with the stated objectives in the EIR, which discusses the reversal of the trend in the loss of wholesale manufacturing in San Francisco that has been stemmed in the past five years if this company were forced to leave. **B.6**

Finally, the Downtown Plan mentions the requirement of the preservation of architectual and historical resources. Six buildings of historical and architectural significance sit on this block in question -- six buildings which we would be willing to work with the City to preserve -- six buildings which **B.6** must be removed if this land is to become a park. **H.1.2**

The EIR fails to address the conflict between the proposed park and the preservation and alternative of development with preservation. **B.6**

The EIR at Section IV.H.12 points out that Howard Street, which is one of the borders of this proposed park, is the lowest density in the entire C-3 District. And we ask why another park is needed on this specific land if the density is now so low. **B.6**

It is our desire to work with the City to meet our mutual objectives of on-site open space and development. The park proposal could put us out of business entirely. The height limitation is a noose around our necks which prevents our future development to maximize the use of the property, retain existing jobs, and create open space. **B.6**

There is a unique ability here to meet other plan objectives such as the elevated pedestrian walkways because of the location of our primary headquarters on one side of Howard, our distribution to our independent contractors on another side of Howard, and our distribution facilities one block away. B.6

The EIR fails to address how these lower impact alternatives could be developed and the impact of the Plan on our company -- B.6

PRESIDENT ROSENBLATT: Mr. Tandler --

MR. TANDLER: My last sentence, sir. We ask for the opportunity to work with you and your staff to accomplish our mutual objectives. But please don't take our land for a park and put our employees and the employees of many other people out of work and choke off our ability to maximize its use in accordance with your objectives of open space and architecturally significant objectives by imposing a height limitation that is discriminatory and different from all the surrounding properties. B.6

Thank you.

PRESIDENT ROSENBLATT: Norman LaForce, and then Robert Armsby.

MR. LaFORCE: I have written comments that I'd like to submit to the Commission. Is somebody available to -- okay. My name is Norman LaForce. I work in San Francisco and live in the East Bay, in El Cerrito. I am also Chair of the Sierra Club Bay Chapter's East Bay Shoreline Park Task Force, which is involved in issues relating to development and growth in the open space area along the East Bay shore from the Oakland Bay Bridge up through Point Isabel in Richmond. **Z.1**

I am greatly affected by and have a strong interest in what happens in San Francisco with the San Francisco Downtown Plan. And I offer the following testimony: I believe that the regional impacts of growth that are provided for in the San Francisco Plan are extremely severe but inadequately analyzed. For example, even under incredibly low growth rates assumed in the EIR, there would be a 51 percent increase in the C-3 District workers who will live in the East Bay by the year 2000. **B.1.2 B.2 D.2.3 D.2.5 D.3.2**

The EIR assumes a very optimistic 88 percent increase in East Bay-bound BART capacity between roughly 1984 and the year 2000. But ridership out of the C-3 District alone is 89 percent. Hence, every last bit of capacity is now used up, and then some, by San Francisco's growth. What about growth in Oakland? What about growth in Berkeley? What about growth in El Cerrito and other areas in the East Bay? Santa Fe Land Improvement Company, for example, a subsidiary of Southern Pacific, is proposing what for Berkeley is a massive commercial development on the East Bay shoreline. **B.2 B.2.1 E.2.3 D.3.2**

The EIR here claims all the growth in BART's capacity belongs to San Francisco. I believe that any analysis must include other growth in its conditions and must include the cost of transit expansion, but that is nowhere mentioned in the EIR. **E.1.4.1 E.2.1.2 E.2.3 E.2.7.4 E.6**

The same situation pertains to freeways. Growth along I-80 and along 101 down along the Peninsula and Marin are not taken into account. Again, San Francisco claims regional transportation corridors for itself. Of course, the EIR never looked at the impacts on freeways outside of San Francisco. For example, the EIR only provides a p.m. peak analysis, even though the a.m. peak conditions are most severe on locations outside the City -- for example, getting on to the Oakland Bay Bridge to get into the City. **E.1.3 E.3.1**

Moreover, the p.m. analysis is deficient as well. The philosophy seems to be that the impacts stop at the San Francisco City limits. But anybody who has tried to go on I-80 up to Richmond or Pinole knows that it's a veritable traffic jam most of the time. These impacts are not mentioned, nor are impacts of future downtown San Francisco growth on these highways discussed. **E.3.1**

What is needed? I believe there is a need for better regional analysis. The EIR must include the impacts of other regional growth when looking at impacts of San Francisco's growth on the region. San Francisco can no longer assume that it can claim all regional transit capacity and transportation corridors for its growth. The analysis must look at, one, conditions today in San Francisco and in the regional areas, two, future conditions with regional growth and no new downtown San Francisco growth, and, three, future conditions with regional and San Francisco growth. In other words, CEQA mandates a cumulative regional analysis.

B.2 D.3.2 E.1.1.2 E.1.5 E.1.7 E.2 E.2.1.3 E.3.1 E.4.3 I.3 N.3 S.2

The EIR should concretely describe delays to be expected on transportation corridors -- that is, how much increased commute time into San Francisco and out of San Francisco and what these commute times will be on average days, light traffic days, or heavy days.

E.1.4.2 E.2.2.3 E.3.1

The EIR should show the cost of necessary and assumed improvements -- for example, how much additional cost will there be for an 88 percent increase in BART capacity for HOV lanes projected for I-80 and 101?

E.1.4.1 E.2.1.2 E.2.7 E.3.3

What is necessary is: The San Francisco Planning Commission must take up its regional responsibilities. People in the East Bay should not be paying for San Francisco's housing, transit, transportation and pollution problems when they are foisted on the East Bay without any regard or concern by San Francisco. We don't need or want San Francisco's problems exported to us. Just as ABAG wants each city to build its fair share of housing, each city must learn to impose its fair share of growth control and to learn to live within the region's limits and its carrying capacity. **B.2 D.2.3 D.2.5 D.3.2 D.3.3 D.5.2 E.1.4.1 E.2.1.2 E.2.7 E.3.3 F.1.2 I.3 N.3**

I believe it's necessary for San Francisco to require developers to pay for regional transit impacts, not simply Muni impacts. I also believe it's necessary for San Francisco to impose an annual limit on its growth. Even with growth projected in the EIR at about 840,000 square feet of office capacity per year, the impacts are tremendous and adverse not only to the City but to the region. San Francisco should impose an annual limit of, at the most, 840,000 square feet, as laid out in the EIR. **E.2.1 E.2.7 E.6.1 P.1**

When I call upon San Francisco to take up its regional responsibilities, I certainly don't mean or intend to imply that Oakland, Berkeley, and the East Bay should not take up their regional responsibilities. The question of growth in the Bay Area is something that affects all the cities, municipalities and governmental entities. **N.3**

And I believe that while we have a hearing now on the San Francisco Downtown Plan, that the same problems and issues I have raised here with regard to the San Francisco Downtown Plan EIR pertain to any of the EIR's that may be presented regarding, for example, growth in the East Bay. And certainly I would expect that the same kinds of problems need to be addressed in those EIR's, too. So I don't want to give the mistaken impression that I am calling upon people of San Francisco to deal with something that other areas should not be called upon to do either. I think this is something that every EIR for every city regarding any kind of development project that requires an EIR needs to address. **N.3 Z.1**

Thank you.

PRESIDENT ROSENBLATT: Robert Armsby, and then Lorraine Yoeman.

MR. ARMSBY: President Rosenblatt, members of the Commission, my name Robert Armsby. I am speaking on behalf of the Joint Chamber of Commerce and American Institute of Architect's Urban Design Task Force. We have spoken to you before on the Downtown Plan, and I want at this time to say we have reviewed the Environmental Impact Report, and we'd like to commend the Department on what we think is a very fine and thorough document. **Z.1**

There are a few areas we'd like to bring to your attention that we believe could use a little more attention. One has to do with what we believe is a condition that needs to be a mitigated, and that has to do with what's referred to usually as benching. For those of you who may not know, this is a condition where previous height controls have resulted in a lot of buildings being at the same height and forming so-called benches. **H.4.1**

The proposed zoning generally results in lower height limits than existing, and therefore any new development would be lower than the existing benching, and there is no opportunity to hide or mask that benching. We believe that what should be considered as a mitigating measure is selectively allowing higher height in certain areas where benching occurs, to be able to mask that. **H.4.1**

Now, in saying that, we are not proposing that there be any increase in density of the district or that area, only that height be increased selectively to mask benching -- be necessary to have transfer of development rights or something else to increase the FAR. But we think that the height increase in that instance would greatly benefit the overall urban form of the City. **H.4.1**

A second area that we believe will have a significant impact and may be understated in the EIR are the proposed sunlight regulations. They are very specific, and we believe overly proscriptive and restrictive, proposals in the Downtown Plan. **H.3.1**

Our recommendations, and we will be talking more about this at the ordinance hearing, is that we believe it's very important and laudatory that certain areas be protected and that attention be given to sunlight. **Z.3**

We think it should be up to a project sponsor to demonstrate to the Commission, to their satisfaction, that these items have been dealt with. But there should be more of a performance standard approach rather than a proscriptive series of specific -- "you shall do this and you shan't do that." So I think that is something we would also recommend get more attention in the EIR. **H.3.1**

A final general area is in the area of bulk controls. We have participated with the staff in developing some of the ideas that are in the bulk controls. But I think, here again, while we agree with the idea of stepping back and some of the things that are contained there, we think that as they stand now, **H.4.1** they're overly proscriptive and too specific, and I think the adverse environmental impact may be, at least in terms of massing, that we may end up with a lot of buildings that, again, tend to look somewhat the same. We had the old complaint about having refrigerator boxes, so-called, because of the previous zoning being very specific. I think we would argue for more flexibility and probably more simplicity in the controls to mitigate against what may become a lot of look-alike buildings. **H.4.1**

Those are really my comments. We plan, as I said, to testify much more fully at the ordinance hearing, which I guess is June 28th now. **Z.1**

Thank you.

PRESIDENT ROSENBLATT: Next.

MS. YEOMAN: Chairman Rosenblatt and Commission members, my name is Lorraine Yeoman. I am speaking as an individual, native of San Francisco, and lived here practically all my life. **Z.1**

I had a look at the EIR, 1100 pages of it. And early on -- I believe it's on Page 11.13 -- is a listing of the matters that they didn't consider were significant enough to study. One of them was the water usage, and directly related to that, the sewer usage. And I can't understand how they can allow for enough buildings to provide 100,000 new jobs -- can you picture 100,000 people? That's more than what runs in the Bay to Breakers race. All these extra people, and it won't affect the sewer usage? I am not concerned about the water. We seem to have plenty. But people do use it and it has to be removed. **F.1.2**

Now, some years ago, they started to build this big new sewer system that was going to take care of everything. They must have known they needed it or they wouldn't have started it. But it's not finished. The cost of the thing has already been tripled, the original estimate. And the cross-town pipeline that was going to take care of the problems from the east side of the City and pump it over to the plant out by Ocean Beach has never even been started, let alone finished. **F.1.1**

I can't understand all this boondoggling and waste. Anyhow, a year and a half ago, the winter storms messed up what they were trying to do at Ocean Beach. They had a platform out there and were trying to build a pipeline to put the treated sewage miles out. Well, it blew away in the storms and never got restored. **F.1.1**

But back to downtown. The average working person can account, according to the Water Department, for about 30 gallons of water per day, which adds up to about three million gallons per day for the whole bunch -- in addition to what's already being used by the people down there now. That amount of water would be, in a period of a year, it would fill a one million dumpster-size tank. That is an awful lot of water to try to get rid of -- and waste water, at that. **F.1.2**

A year or so ago there was an overflow out at Hunters Point, great consternation, bad smell. What are you going to do? And parts of the downtown area, sewage has to be pumped from the basements to the sewer. We are not on a mountain where you can have a runoff and get rid of it. We have to deal with what we have right here. **F.1.1 F.1.2**

I don't know what the contractors who were supposed to be building the sewage plant and the cross-town pipe got away with, not doing their job. Now, some years ago I had a man doing a job on my house. He didn't do it well. The Building Inspector wouldn't pass it. So I fired the bum, took him to court, and got enough of a settlement to get somebody else to finish the job and correct the mistakes. If I can do it, I don't know why the City can't. **F.1.1**

And, as I said, there is no point in adding all these extra buildings and jobs when the City is not ready to cope with what's obviously going to happen. I wish you'd pay more attention to that and get the infrastructure ready before you add all these extras. **F.1.2**

Thank you.

PRESIDENT ROSENBLATT: The next speaker is -- well, there seem to be multiple speakers. The group from the San Francisco Women Lawyers' Alliance. Is there anyone here from that group?

MR. LANDIS-BRENMAN: Yes, Mr. President.

PRESIDENT ROSENBLATT: Could you introduce yourself, please? There are three or four names on our card.

MR. LANDIS-BRENMAN: Yes, My name is Eric Landis-Brenman, and I am here on behalf of the San Francisco Women Lawyers' Alliance Subcommittee on Childcare. **Z.1**

Before I begin, I have my written testimony here that I would like you all to have a copy of. Yes. Eric Landis-Brenman. It's spelled out there. I am just learning to spell it myself. **Z.1**

Good afternoon, Mr. President and Commissioners. It's a pleasure to be here this afternoon. To reiterate what Ms. Ramey has already discussed, and that is, one of the focal points of the San Francisco Women Lawyers' Alliance, the need for childcare in downtown San Francisco. The alliance is appearing before you today to address what it considers a critical omission from the proposed Downtown Plan and the Draft Environmental Impact Report, namely the need of working parents in the Downtown District for high quality and affordable childcare services. Z.2

While the Downtown Plan articulates important policies for the provision of housing to mitigate the impact of increased employment, neither the Plan nor the Environmental Impact Report takes into account the substantial impact that the City's projected economic growth will have on the already inadequate supply of childcare services. Z.2

Dramatic changes in the structure of the national workforce have elevated childcare to a serious economic issue affecting most American families. The need for childcare in fact crosses all economic, educational, and social boundaries. Z.2

Statistics compiled during recent census reports and surveys illustrate the factors behind the increasing need for childcare. In the United States, fully 46 percent of the workforce is made up of working mothers with children under six. In the Bay Area, more than 50 percent of mothers with children age six and under are working. And in San Francisco, the parents comprise about one-third of the workforce. **Z.1 Z.2**

A recently released survey conducted by the California Childcare Resource and Referral Network has projected that the number of children nine and under in the Bay Area needing childcare will increase to over 128,000 by 1985. And in San Francisco alone, over 23,200 children under nine will require childcare, of whom only about 13,000 will find spaces. **Z.1 Z.2**

This shortage of childcare services is especially acute in downtown San Francisco, where only one facility currently exists, and that is at Golden Gate University, which houses -- and I should say it's an excellent center, but it houses only 34 children. So it doesn't quite meet the demand. **Z.1 Z.2**

The current Downtown Plan projects that, by the year 2000, there will be an additional 100,000 new downtown workers in San Francisco. Yet nowhere in the current Downtown Plan is there to be found any land use policy designed to accommodate the increased demand for childcare that such a growth in employment will surely generate. **A.1 Z.2**

In fact, the Draft Environmental Impact Report indicates that by the year 2000, the space available for cultural, educational, institutional and non-commercial uses -- space that could be allocated for childcare facilities -- will decline by ten percent. Z.1 Z.2

In light of the statistics documenting the already severe shortage of childcare services in San Francisco, it is imperative that the San Francisco Planning Commission act now to ensure that the childcare needs generated by San Francisco's employment growth are adequately accounted for in the Downtown Plan. Z.1 Z.2

It is the Alliance's belief that the projected need for childcare services must be included as an integral component of the Downtown Plan and Environment Impact Report's forecast for employment, land use, and real estate development in downtown San Francisco. Z.1 Z.2

As a concrete agenda toward the provision of affordable, quality childcare facilities in downtown San Francisco, the Alliance proposes the following recommendations to the Planning Commission: Adopt policies and incentives that would facilitate and encourage the inclusion of quality, affordable childcare facilities in downtown developments -- that is, existing, newly built or renovated buildings. Z.1 Z.2

Because the childcare center cannot compete on an economic level with office or retail tenents, leases for childcare centers must provide for the following:

Complete rent subsidy; a ceiling on operating costs, which includes utilities and disposal, et cetera; adjacent outdoor space; compliance with all applicable licensing requirements; and a minimum 20-year term so that the center has an ability to become financially solvent and gain momentum. **Z.1 Z.2**

Secondly, the Commission should adopt policies and procedures to facilitate the flow of information to concerned groups, such as the Alliance, regarding proposed developments or renovations so that these groups may contact the developers, renovators, regarding the need and incentives for including childcare centers in such development. **Z.1 Z.2**

And thirdly, the Commission should adopt other policies favoring the provision of childcare services that would mitigate the impact of increased employment resulting from downtown development. **Z.1 Z.2**

I'd like to spend a minute with our chart over there which highlights the need that I have been addressing here. This is a chart indicating the 1985 estimated demand for childcare in San Francisco. And the total demand estimated by agencies such as the California Network and Referral Agency is roughly 23 to 24,000 spaces. Currently available in San Francisco are 13,000, which leaves over 10,000 slots needed.

Where these parents -- myself being one -- are finding childcare is a very difficult problem -- often in other parts of the City or in the East Bay or on the Peninsula. **Z.1 Z.2**

To the Alliance's knowledge, there are no current plans by the City of San Francisco to alleviate the needs of working parents for quality, affordable childcare by providing downtown childcare facilities. One encouraging prospect, however, is a resolution drafted by the City Planning Department and currently pending before the San Francisco Board of Supervisors concerning the exclusion of space allocated for childcare facilities from the floor area ratio in the Downtown Commercial District. The Alliance is strongly in favor of such an initiative. **Z.1 Z.2**

In addition, the Alliance currently has a proposal before the United States Postal Service and the Redevelopment Agency for the inclusion of childcare facilities for 48 infants and preschoolers in the Postal Service's Rincon Center Development Project now under consideration. **Z.1 Z.2**

I would like to at this point offer you three copies of our submitted proposed to the Postal Service and Redevelopment Agency for your reference use. I think it would be helpful in that it highlights what I have been speaking about today as well as going into further detail of the problem. **Z.1 Z.2**

We see this proposed Rincon Annex Childcare Center as a step toward alleviating the acute shortage of childcare facilities. More importantly, we think the Rincon Annex Childcare Center has the potential for attracting nationwide attention as a model of innovative urban planning, combining commercial development with a sensitivity to community needs. By adopting policies designed to encourage the inclusion of childcare services in downtown developments, the Planning Commission will enable other groups to initiate similar projects throughout downtown San Francisco. **Z.1 Z.2**

We strongly urge that the Commission study the issue of downtown childcare services with a view to its significance to the Downtown Plan. Members of the Childcare Committee of the San Francisco Women Lawyers Alliance stand ready to assist you in this effort. **Z.1 Z.2**

And finally, before I conclude, I would, in the interest of expediting this hearing, introduce a speaker who has just a few minute presentation concerning the same issue, and that is Roxanne Camus. So, with your permission, I would have her be appended to my talk, if that is okay. **Z.1**

PRESIDENT ROSENBLATT: Could you spell your name, please.

MS. CAMUS: C-a-m-u-s.

PRESIDENT ROSENBLATT: We missed your first name.

MS. CAMUS: Sorry. Roxanne. R-o-x-a-n-n-e.

PRESIDENT ROSENBLATT: Thank you.

MS. CAMUS: Mr. President and members of the Commission, I would like to speak on behalf of the working women in the 450 Sutter Street Building. There is an obvious need, as presented by the San Francisco Women Lawyers' Alliance, for childcare in the downtown area. **Z.1**

We have heard it said that parents don't want their kids in the downtown area. But, on the contrary, the women at 450 Sutter have expressed a desire to have their children on-site. The women have stated that there is a lack of women being employed in the building because the doctors that are there are refusing to hire women with children because they have to leave sometimes to go for emergency matters and things, and most of their children are a great distance from the building. **Z.1**

Our main problem now in establishing a childcare center in the building is that the Fire

Inspectors are not aware of the Codes regarding childcare centers. And the main reason is because they haven't had to deal with childcare centers in the downtown areas, so they are just not used to it. But we would like to encourage you and the Commission to consider all of the issues in order to increase the expansion of childcare in the downtown area, and especially to work it out with the Fire Inspectors and the Codes. **Z.1 Z.2**

Thank you.

PRESIDENT ROSENBLATT: The next speaker is Barry Wofsy, and then Joel Vantresca.

MR. WOFSY: Good afternoon, Mr. President and members of the Commission. My name Barry Wofsy. I am Vice President of the Council of Neighborhood Associations and Chairperson of the Progressive Neighborhood Alternative, both based in the East Bay. **Z.1**

I come to address you on the Downtown Plan EIR. I'd like to read a few of the comments that I will hand in and will be included in the statements, and then I'd like to ad-lib a little bit after that. **Z.1**

I was impressed by the size of Downtown Plan's EIR and particularly the beauty of the presentation's visuals. It is truly unfortunate that this EIR opted for style over content. In the final analysis, and I read the entire Environmental Impact Report, this study lacks a coherent vision of the City and the region and fails to fully address the negative impacts of this Plan and refuses to seriously consider any real alternatives to this Plan. **Q S Z.1**

The only study that I have read on financial implications of large-scale downtown San Francisco development that seems to be both accurate and reasonable is the Sedway-Cooke study done for the San Francisco Planning Commission in 1979. This study concluded that the initial cost to San Francisco taxpayers is 25 percent greater than revenues generated from new downtown San Francisco development. This is basically a subsidy of large-scale developers that is paid for by the residents and taxpayers of San Francisco. This was not addressed adequately in this study. **Z.3**

I believe that the smallest regulatory limit discussed in the Environmental Impact Report, which was .5 million square feet per year, is too great, and I would like to see an analysis of something more on the order of .3 million square feet per year incorporated into this. This would be important, because I believe that that amount of growth would have absolutely no unavoidable significant environmental impacts. **P.1**

Basically this Plan has failed to analyze thoroughly the traffic, the parking, and the housing impacts that will be generated by this proposal if it was accepted by this Commission. The only way that we feel that this project -- if accepted by this Commission -- could be mitigated would be limiting the growth. And we feel that the other possibilities would be guaranteeing jobs to San Francisco residents. This would at least limit some of the congestion that we foresee on the bridges and highways projected. **B.4.1 D.3 D.3.2.3 E.3 E.4 P.1 Q.4**

The analysis of this Plan in no way looked at the regional impacts. As was mentioned earlier to you, there is a massive development proposed for Berkeley's waterfront area which is not included at all in this. This will have no public transportation access and is approximately two miles from the Bay Bridge access points. I don't think it's reasonable for an Environmental Impact Report to simply study this narrow region. You have immense growth all along the BART facilities, and we feel that this EIR is certainly not legally certifiable at this time and would probably have to increase mitigations dramatically. **B.2 D.3.2 E.2.3 E.3.1 E.6 N.3**

In addition to guaranteeing jobs to San Francisco residents, we feel that the amount of jobs created in a project like this would put a burden on the East Bay, in particular, and all adjoining areas to San Francisco in terms of housing. We have a housing crisis, for example, in Berkeley at this time, and this will only heighten it. And we are wondering: Where is the mitigation in this Plan, not only for San Francisco housing, which will drive up much higher prices for those who rent, but also in the region as a whole? We cannot allow San Francisco to continue to develop in this mega way without at least mitigating those avoidable problems that arise afterwards. **D.2 D.2.3 D.3.2.2 D.3.2.3 D.3.2**

It seems to many of us that this Plan, those that support this kind of plan, are a very small minority. It seems to be those of the largest corporate developers and groups such as Santa Fe, groups such as Southern Pacific who will benefit by this by greatly increasing the values of the land for this small handful of corporate entities and those who do their apologizing for them. **A.1 Z.1**

We feel basically that the people who live in San Francisco and the people who live adjoining to San Francisco will suffer dramatically in terms of lessening of the quality of their life which will be able to be seen in the congestion that will follow. And we don't think it is a fair or reasonable thing for this Commission to consider making a few, a handful of vested interests extremely wealthy at the expense of not only those who put you in this position, but those of us who cannot either put you in or take you out of your position. **Z.1**

We feel that the threat of this kind of development is so great that we will be monitoring it very closely. And if all of the housing impacts, the transit impacts that can be foreseen in this project are not totally mitigated, we will consider this to be an uncertifiable EIR, and we will challenge it. **D.3 D.5 E.2 E.6 E.7**

Thank you very much.

PRESIDENT ROSENBLATT: Joel Vantresca, and then Michael Harney.

MR. VANTRESCA: Commissioners, good afternoon. My name Joel Vantresca, and I am a former president of a neighborhood association. And I am a 13-year resident of the Haight-Ashbury. So a number of the trends that I am going to talk about this afternoon, I have seen firsthand. **Z.1**

The City's urban programs and development policies have been assalting low-income and moderate-income neighborhoods for 20 years in working with the pro-growth business interests of the City to displace and gentrify a large part of the City's population. This trend is not in this report. Most of the data is

1981, 1982, 1983. This report draws a line in the sand and goes forward. It ignores what has happened over the last 20 years. **B.4.2 D.1**

Hopefully, this Environmental Impact Report can identify the demographic changes for '60, '70 and '80 and project '90 and the year 2000. This report doesn't do that. **D.1**

As part of this urban renewal process, two neighborhoods were literally demolished and looked like bombed-out blocks in the cities in Europe after World War II. The City's policies and programs have hastened market forces that have encouraged displacement and gentrification. San Francisco has experienced an unprecedented boom in downtown office building construction and expansion of hospitals and other service institutions. For example, the acreage occupied by hospitals quadrupled from 46 to 166 acres in a six-year period. In terms of downtown, between 1965 and 1983, office building construction grew 36 million square feet -- that is 70 high-rise buildings. By the end of the century, another 24 million square feet can be added under this Plan. **B.1.1 B.4.2 Z.1**

And this Plan promises that the growth pattern that has existed since 1965 can continue to go forward. There are a number of trends that are occurring in the

City which are not dealt with in this report, and hopefully when it's modified it can be included. Gentrification, touristification, condofication -- that's a trend I can't even pronounce, but I think we all understand what it means -- residential units being converted to commercial uses; a competitive housing market becoming more and more competitive; and displacement of existing residents. These are all trends that will increase with this Plan. They deserve more attention than they get in this report. And hopefully they will. **D.1 B.4.2 D.3.1**

After reading the report, I get the impression that we are proceeding with a policy of growth at any cost. Developers, investors, builders will win with this Plan; existing residents will lose. An urban elite will be created, it's hinted at in this report, and is being created that will exclude many of us in this room from our existing neighborhoods and perhaps from the City. **A.1 B.4.2 D.3.1**

This Plan is discriminatory towards existing residents. It factors them out in this vision of the future of the City. A way to describe this is: The City is like a calm pool of water. The rock of downtown development has been thrown into the pool, creating multiple ripples throughout the City's neighborhoods. Just a few examples, which just is the surface of these trends that I am trying to describe. In the South of Market, 3800 individuals, 250 families, almost 600 small businesses were displaced by the Yerba Buena Project. In the Tenderloin, four hotel towers are being constructed or will be constructed which will adversely affect that neighborhood. In the Western Addition, 3200 families and almost 4,000 single individuals were displaced by redevelopment and planning policies there. In Chinatown recently, 418 residential hotel rooms have been lost since 1980, which is a hardship on low- and moderate-income seniors in that community. In the Haight-Ashbury, where I'm from, gentrification is occurring at a rate that is just becoming known when you compare '70 versus '80 census data. For example, from 1970 to 1980, blacks were reduced in the Haight from 33 percent of the total population to 18 percent of the population, which is a reduction of 3200 blacks from our neighborhood. **B.4.1 B.4.2 D.1 D.3.1 Z.1**

There have been other ripple effects throughout the City because of downtown development, which is not in this report, and it should be if it's to be an accurate reflection of what's occurred. **B D E F**

The Port has been undermined by building high-rises up to the waterfront itself, which has cut off rail and truck transportation systems needed to move cargo in and out of the area. Thousands of blue collar jobs have been destroyed as a result. **B.4.1 E.3.2**

Ethnic minorities have been affected, as I mentioned before. Of all the major cities in the United States, San Francisco is the only one with the absolute number of blacks being decreased between 1970 and 1980. That is a decrease of ten percent. Families have left the City. The population of children in San Francisco, when you compare '70 versus '80 census data, reflects that there has been a 30-percent reduction in the number of children 16 years and under in the City. **B.4 D.1 D.3.1**

Housing has also been affected. According to some studies, the housing costs in the City are the highest in the nation. In terms of displacement, the degree of displacement needs to be explained in this report. I spent several hours going through this report, and I could only find one reference that tried to describe what might happen in the future of the City in terms of demographics. Section IV.D.79, and I quote -- this is in the report: " . . . there could be effects on the mix of types of residents in San Francisco," quote-unquote. That is the extent of an explanation as to what the demographic changes will be in '90 and the year 2000 as a result of this report.

So, this Plan ignores the resulting displacement of existing low- and middle-income families in San Francisco. **B.4.2 D.1 D.2.2 D.3.1**

Again, the question that needs to be addressed in this report is: What will be the demographic characteristics of the future residents of the City and its neighborhoods? We know what has occurred in '60, '70 and '80. This report needs to tell us what will occur in '90 and the year 2000. We are in the midst of great change in the demographics of the City. One-quarter of the City's residents in 1975 no longer lived in San Francisco five years later, in 1980. In other words, put the other way, one quarter of the City's residents in 1980 did not live here in 1975. **D.1**

Moving to alternatives that I think need to be explored in this study, there are two alternatives that I think need to be looked at. One is the no growth alternatives. It's not in this report. All the alternatives that are examined here basically show similar rates of growth. If the City were to toy with the idea of a no-growth policy for downtown development so we could take a breather and absorb the negative impacts that have resulted from downtown development over the last 20 years -- it needs to look at that. This report does not do that. **Q.1**

Another alternative is a real slow growth alternative below the scenarios presented as alternatives in this report, a slow growth alternative that would restrict height, bulk, density, and location of high-rise buildings in San Francisco. **Q.2**

In conclusion, if the medicine is more downtown growth, as offered by this Plan, the patient, I believe, will become sicker. We have to come to terms with the idea that if the medicine isn't working, we should stop taking it. **Q.1 Q.2 Z.1**

Thank you.

PRESIDENT ROSENBLATT: Michael Harney, and then Bruce Marshall.

MR. HARNEY: My name is Michael Harney, and I'm a member of the Steering Committee of the Affordable Housing Alliance and of the San Francisco Tenants and Housing Council. **Z.1**

Both of these organizations are extremely concerned about the relationship between downtown growth and San Francisco's continuing and incredible housing crisis. My personal examination of the Draft EIR on the Downtown Plan reveals an analysis, prescription which seems totally inadequate to this incredible and continuing crisis. **B.4.2 D.3.1**

Some of the problems have already been touched on by other speakers. One thing that needs to be noted is the vacuum that these EIR's seem to be created in. I remind the Commission that San Francisco is required by state law to completely revise the Housing Element of the Master Plan. Now, the Downtown Plan will become another element of the same Master Plan of the City and County. And the revision of the Housing Element will require revision of the EIR for the Housing Element. Many of the same problems, details, and data which are required for the Downtown EIR housing discussion will be required for the Housing Element. These two things need to be coordinated. They don't necessarily need to be duplicated. **A.2**

Presently it seems that the Downtown EIR is not dealing with all of the questions that need to be dealt with and need to be coordinated with the Housing Element, which I think has to be completely revised by July of this year. **A.2**

More specifically, the discussion in the EIR on housing problems has, in many instances, tended to either be obscure or tautological or circular. One of the key things is: What is going to be the impact of downtown growth on the percentage income that residents will have to pay for housing in the future? The analysis seems to indicate that it will go up. But it's completely unable to quantify exactly how much is going to be paid for housing in the future. **D.3.1 D.4**

Typical of the discussion is found in Section IV.D.21 to 22 in the discussion of costs of housing and impact on the residents the City. And the Plan says, quote, "Housing now costs more than it did relative to other household expenditures and income. Therefore, a given amount of financial resources purchased less housing than had been the case before, and, as a result, households are going to be paying a larger percentage of their income on housing," end of the quote. **Z.1 D.4**

This reminds me of the discussion of Calvin Coolidge on the problem of unemployment when he said, "When many men are out of work, there is widespread unemployment." The housing EIR is saying, "When housing costs go up, it costs more to live in housing in San Francisco." This is unassailable but ultimately trivial. The question is: How much is it going to go up and what are you doing to do to prevent people from being displaced? **D.3.1 D.4 D.5 D.5.4**

And the continuing displacement, as the previous speaker said, has the effect of dramatically changing the racial and ethnic balance of San Francisco. The displacement which is going to occur and which the discussion mentions in South of Market, Chinatown -- the discussion doesn't really quantify, doesn't really suggest any way to mitigate, doesn't adequately explain the dynamics of what's going to happen when you do the kinds of development called for on the Van Ness Corridor, on Rincon Hill, in the South of Market. **B.4.2 D.1 D.3.1 D.5**

The ripple effects of building thousands of units of market rate and near market rate housing on those surrounding neighborhoods and displacing people -- how many people are going to be displaced? How many residential hotels are going to be torn down? **B.4.2**

The discussion of income going to housing and what happens when people move has an air of complete unreality to anyone familiar with the rental housing situation in San Francisco. Key to that is, of course, the rent ordinance. Key to the rent ordinance is the fact that we have what is known as vacancy decontrol, which means that when people move, the rents can be increased any amount, rather than the four percent, which is the formula that the rent control ordinance uses. **B.4.2**

The effect of vacancy control on people who are going to be displaced, the effect of the vacancy decontrol provision in the rent ordinance, together with all the ripple effects which will be caused by this downtown development -- what are these effects, I ask. Can they be quantified? Can the alternative of imposing vacancy controls, which the Mayor unfortunately vetoed, can that alternative be conceivably one of the mitigating facts, mitigating measures which will have some effect? **B.4.2 D.3.1**

There is no discussion that I can see of that key fact. And the whole impact of the Residential Hotel Conversion Ordinance, which is a companion ordinance to the rent control ordinance which, to most observers, has failed. One alternative would be to beef that up if indeed, as the Plan points out, there is going to be tremendous pressure. That alternative is not considered. **B.4.2**

The whole regional impact, which was touched on by previous speakers. San Francisco is merely a part of a regional housing market which extends over portions of nine counties. The building of housing in other areas, the building of houses in San Francisco does not happen alone and in a vacuum, and they're not unrelated. **D.3.2.1 N.3**

But aside from a couple of paragraphs, I see virtually nothing in this EIR which deals with that regional impact, which is essential to the Residential

Element of the Master Plan and to any reasonable and intelligent discussion of what the impact of this downtown is going to be on housing costs, on commuting patterns between home and work throughout the San Francisco Bay Region. The effect is going to be extremely dramatic. But what it is, we don't know. And perhaps we should know. And if the City wants to have a certifiable EIR, I would suggest they put that in. **A.2 D.3.2 D.4 E.1.4.2 E.1.5 E.2 E.3.1**

Many other difficulties with this. And I feel that it would best to close now with a plea that more needs to be done. **Z.1**

Thank you.

PRESIDENT ROSENBLATT: Bruce Marshall, and Michael Levin.

MR. MARSHALL: Commissioners, my name is Bruce Marshall, and I'm testifying on behalf of the Muni Coalition. **Z.1**

For several years we have talked about, written about, testified about the need for there to be a rational plan for growth in the City as it affects Muni, that you can't keep putting one high-rise after another without having Muni improved and having a financial system set up to pay for it. Unfortunately, in the EIR, these problems are going to continue. **E.2.2 E.2.7**

There are three major areas that we think are problems. No. 1, the EIR doesn't deal with the financial impact on Muni of continued high-rise growth; doesn't deal the area of mitigation sufficiently. And, in addition to that, the statistical analysis used as regards passenger loads, future capacity, present capacity, is not very accurate. E.2.2 E.6 E.6.2

I am not going to go into that here, but one thing I noticed right away was the load factor on light rail vehicles, the streetcars, was listed as 2.0, two standees for every seat. First of all, this was 1.5 the last time I looked in the EIR, and I don't know what it's gone up to. But two standees for every seat is 136 people, which is crush load conditions. And I don't think that is acceptable load factors. E.2.2.1

The big problem with the EIR as we see it is that the issue of mitigation is not dealt with in either a realistic or comprehensive manner. One area of mitigation mentioned is having a Transit Impact Development Fee. At this very moment, two floors up, that is in litigation. But even so, the EIR doesn't mention the fact that, as administered by the Board of Supervisors, it only accounts for approximately 55 percent of the costs generated by the development. So that even if that does become law, it will not even come close to paying for the future impacts. **E.2.7.2**

I cannot find any mention of, as an alternative mitigation, a Transit Assessment District, which we've talked about many times and which has been before the Board of Supervisors and talked about in the Mayor's Office. If development is going to continue to advance into the South of Market area, this becomes even more important, so that there is in place a funding mechanism from Muni so that every year you know you are going to have the money to pay for the service needed, and thus you can go ahead and have development if you wish. **E.2.7.3**

The other area of mitigation that is mentioned is having transit-only malls, transit-only streets. That is great. It talks about the Market Street closing. But it doesn't mention the fact that this once before was proposed. It got as far as the Mayor's Office, and she vetoed it. There is no mention of that. **E.6.2.4 E.6.3**

There is no mention of the fact that the Board of Supervisors fights tooth and nail every attempt to install transit-only lanes. But I couldn't find that in the EIR. That is something I feel should be considered. What is the probability of mitigation measures? But probability factors are not dealt with in the EIR. **E.6.2.4**

Now, even if all the capital improvements mentioned can happen, is it fair that the Federal government, that taxpayers in New Hampshire or Massachusetts, should they have to pay for the development that goes on in San Francisco? That's really what you're asking. And it's a question that's never dealt with. **E.2.7.4**

We have the BART sales tax, which is really a subsidy for BART, and thus a subsidy for downtown development, which is not a fair tax; it's a regressive tax. But the value system of this is never mentioned, is never talked about. And we wonder if it's fair. We don't think it is fair. We think that those who benefit from downtown development and those who cause the problems that go with it should be required to pay their fair share. **E.2.7.4**

But let's say all this happens; let's say we have all these unrealistic capital improvements. There is no mention of the operating costs of the system once you have it. This has been a problem for several years with Muni. There hasn't been the funds there, no matter what Mayor Feinstein says. She and the Board have not given the funds to Muni so that it can operate efficiently. **E.2.1.3** **E.2.7.1** **E.2.7.4** **E.6.2.1**

So what will happen? What will happen if all this development goes forward? Well, the first thing is that fares will have to go up to pay for it. And if the State fare box requirement continues, it's going to go up even more than without it. They'll just skyrocket. E.2.7 E.6.2.1

Then you'll have ridership going down, of course, and then service will be cut. This is a vicious cycle that we have seen in other places -- we have seen it in a New York City, where the system is now in shambles. And we're seeing it in this city; it's already happening. E.2.7 E.6.2.1 P.2.1. Z.1

Maintenance will be deferred, weekend service will be reduced, nighttime service will be reduced. All the resources of Muni are going to be poured into providing p.m., a.m. rush hour service. And, as I said, all this is happening right now. Transit vehicles will be stuck in traffic. They won't be able to move. Montgomery Street is going to be unpassable. E.2 E.2.2.3

This translates into even more operating costs, and I didn't see any mention of that. I didn't see an analysis of that in the EIR. We think there should be an analysis of how the slowdown in service, which will come about and which is acknowledged in the EIR, how that translates into increased operating costs for the system. E.2.2.3

Just to close, we don't feel that this Plan and this EIR is in any way a comprehensive planning document. It's not planning. It's an urban design plan. It's giving pretty high-rises to look at, nice sculptured tops, setbacks and all this. But it's not planning, and it's about time that we started getting it in this city. A.1

MR. LEVIN: Mr. President and Commissioners, my name is Michael Levin. I am a lifelong resident of this city, and I am here representing only myself, though. Z.1

I appreciate the additional time for public comment. Personally, I haven't even been able to find a suitable binder for my copy to the Draft EIR, but I have had a chance to peruse it somewhat briefly. And, similarly, my comments today will be very brief. S.1.3

When I saw the newspaper headline in the Examiner when the Plan came out in March, "Hellish downtown seen by year 2000," I wasn't very encouraged. But maybe that helped to sell the paper that day; I don't know. I am particularly concerned about the issues of architectural and historic resources and urban design. And I see there are at least a couple of people in the audience today who are much better equipped to address those issues than I am. I do want to express my great frustration about the fact that, as stated in the Draft EIR, some 37 highly rated or significant structures were demolished in the downtown in the short period of less than four years, from 1979 to 1983. **H.1.1 Z.1**

Although the proposed Downtown Plan itself appeared very encouraging with regard to preservation and other issues, I am very concerned that the Draft EIR predicts the demolition or substantial alteration of another 84 significant and contributory architectural resources, as they're called in the EIR, during the next 16 years. **C Z.1**

Is this really inevitable under the proposed Downtown Plan, which is said to be the best of all the alternatives discussed? Perhaps I missed something in my quick perusal of the EIR, but I feel there should be a more thorough discussion of alternatives to this unabated destruction of architectural resources in this city. **C.1**

Now, we do have a landmarks policy in effect under which many structures now have limited protection. And, of course, the Plan proposes to not allow the demolition of any city landmarks. Of course, you who make policy and the public at large all have a much greater awareness of the value of architectural and historical resources and urban design, yet we're still losing these resource at a high rate. **H.1.1**

It seems to me that we need to have a much stronger policy of preservation, and such a policy is well justified by the recklessness of the past. I am sure most of us would agree that a plan such as this is at least 25 years too late with regard to preservation of architectural resources. Now is the time to really implement a strong policy and not just go on with business as usual. **A.1**

Thank you very much.

PRESIDENT ROSENBLATT: The next speaker is Calvin Welch, to be followed by Susan Parker.

MR. WELCH: My name is Calvin Welch, and I am speaking for the Council of Community Housing Organizations. And I did find a binder. And you can find it South of Market, if you go quick. Real quick. The supply store may be gone. **B.4.1** **Z.1**

The Council of Community Housing Organizations is a group of nonprofit community-based housing development corporations dedicated to the production of affordable housing in the City and County of San Francisco. **Z.1**

As you are no doubt aware and remember, we have been interested and involved in the process of the Office/Housing Production Program. And I would like to devote the latter part of my comments to the strange case of the disappearing OHPP in this document. But before I do so, I would like to address myself to the general question of affordable housing and the discussion of affordable housing in this document. D.4 D.5.1

Clearly, this Commission, in going through any number of Environmental Impact Reports, is perfectly familiar with the facts that are made plain in this document, a little less plain than in some other Environmental Impact Reports, that the workforce of downtown commercial office buildings are not all $40,000 a year executives, but basically run the gamut very typical of employment, of the general employment categories that we find outside of the C-3 District. D.4 Z.1

The reason that I make that point, to emphasize that point at the beginning of my remarks, is that this document seems to note and then ignore that fact in its discussion of both housing as a problem, or the existing setting, and in terms of the section that deals with housing mitigation. D.4

Where is the linkage -- not "Where is the beef?" -- where is the linkage between the known costs of housing and the known income level of the workforce, and how are we to match, if we are to mitigate the housing impacts, drastically laid out in this document, of 121,000 additional employees -- how are we to house these people in the typical form that has been articulated in this document? **D.2.6 D.4**

I refer you to what I find a chilling paragraph on Page IV.B.50 of this document. In discussing new housing in the C-3 District, the preparers of this EIR wrote the following: "The new housing units" -- a massive 600 that are proposed for the C-3 District -- "would vary in size, averaging around 900 to 1,000 square feet per unit. The new housing would be offered at market prices except for a small number of units which might be built for low- and moderate-income households (such as those proposed for the Rincon Annex site). The sales prices of the market units would vary by location and size of unit, possibly averaging $240,000 per unit and ranging from $160,000 to $300,000 per unit (in 1982 dollars)," end of statement. 1,000 square feet, $240,000 per unit. **D.2.6 Z.1**

I submit to you that if present trends continue, that is what will be offered. I also submit to you that that is absurd. It is an absurd notion that the projected workforce of these buildings -- not arguing the question of whether or not these buildings should occur -- but the projected workforce of these buildings being able to afford $240,000 for a thousand square foot luxury closet is an absurdity. Yet that is the setting that we go from. With that as a setting, imagine my chagrin and surprise when I turn to the mitigation section to find virtually no discussion -- zero, zip -- of affordability, of dealing with making housing affordable, not to even general San Franciscans, but to the proposed workforce of these commercial high-rise office buildings. **D.2.6 D.4 D.5**

In a close repeated reading, with the use of various aids, mind aids from aspirins to possibly illegal substances, I could not find a detailed discussion of what is the obvious connection between allowing commercial high-rise development to extend deep into the South of Market, which this Department and this Commission has articulated repeatedly is the most effective housing opportunity site area for affordable housing; there was no discussion of the loss of affordable housing development sites by steering commercial high-rise development into the South of Market. Yet this Commission has received reports from its own staff in the past saying that it is in the South of Market and eastern portions of the City that most affordable housing site opportunities exist. No discussion. **B.4.2**

There is no discussion in this mitigation section or in the setting of the ripple effect known and articulated in the Environmental Impact Report for YBC and its various supplements of high commercial development in the South of Market neighborhoods in terms of the ripple effect on existing low- and moderate-income housing units, most especially those providing housing for families and those single-room occupancies which make up the vast bulk of the existing affordable housing in the downtown area. No discussion. No discussion on what will happen to them. No discussion in any detail that they in fact exist. Also, both your existing Housing Element and the Downtown Plan itself -- not this document, but the Downtown Plan itself -- makes much note that the majority of the affordable housing that exists in the downtown area exists in residential hotels. **B.4.2**

What is the impact of directing commercial high-rise development -- which this document demonstrates will probably cause land prices for commercial development to increase -- what is the impact on housing? What is the impact on the loss of future available sites? What is the impact on the displacement of existing uses? This document stands silent. That is a tremendous oversight for a document that claims to comprehensively look at the future of downtown San Francisco into the year 2000. **B.4**

So here we have articulated 1,000 square foot housing units costing $240,000 in the setting -- this is what we can assume will happen. A massive 20-odd million -- some of it very odd -- square feet of commercial office development earmarked -- new -- earmarked for the South of Market area, and no discussion on existing affordable housing sites or existing affordable housing uses. That mars grievously the complete inadequacy of this Environmental Impact Report. **B.2.1 B.4.2**

But that is not even enough. When you get to the tables at the end, it's as if you have entered the land of folks wearing large hats and capes with moons and stars on them. In short, we enter the blue smoke and mirror land of assumptions that dramatically affect the outcome. And let me give you two assumptions that are made that allow the statement to be made that about 19,000 housing units -- not dealing with the question of how much they cost -- but about 19,000 housing units will be built, with these two following assumptions: One that occurs on Page V.D.11 -- I find it fascinating and somehow fitting that the section dealing with housing mitigation is "V.D." The assumption is made in a footnote that "Housing to be built over the next 20 years will exceed the amount of housing build in San Francisco in the last 20 years." It's just a bald assumption. There is no support for that assumption, but that is an assumption made in that methodological section. **D.2.2 D.2.6**

An even more staggering assumption that is also made in the same section is: The preparers of this report blithely assume that the household size of the workforce in the C-3 office building will increase. They articulate that, for the rest of San Francisco, the household size will continue to decline. But magically in the C-3 District, the household size will dramatically increase, thus understating, in my opinion, the demand for housing of the workforce. They just blithely assume that the household size of commercial high-rise office building workers will increase. And when you ask: Why will it increase, you get, I think, at the heart of the assumptions of this study. It will increase because it will cost too much to live otherwise. **D.2.4**

Those two assumptions alone, that somehow dramatically the amount of housing built in the previous 20 years is going to be outstripped by the housing built in the next 20 years and that the household size, the average household size for the C-3 office worker, will increase while the rest of the household size in San Francisco will decline, those assumptions, I submit to you, are made to make numbers work, not reflect reality. Therefore, the great inadequacy of this document is in addressing itself to the single most critical question in this town at this time, which is the provision of affordable housing for residents in San Francisco. **D.2.2 D.2.4 D.4**

Great stock and much ink is spilled over one of the most obtuse and odd discussions of the Office/Housing Production Program that has ever been my experience to read. First we are told that the Office/Housing Production Program is not assumed to exist for the use of this survey, for the use of this EIR. Since it is not part of the Downtown Plan, we are not looking at the Office/Housing Production Program. **D.5.1**

We then see, in various addendums and various mitigation sections, "Well, let's assume that the OHPP exists." The only way to summarize this rather odd discussion that housing even begins to approach the demand articulated in this document is with an OHPP. Yet nowhere in this document is the OHPP in fact discussed in terms of what its provisions are, how will it be applied, or the fact that currently the OHPP is before the Board of Supervisors in a dramatically different form than the current existing OHPP. So, quite frankly, I mean, it's "now you see it, now you don't." The only way that the numbers even appear to work is with an assumption of an OHPP, yet this OHPP is not part of this document, but it appears time and time again as part of the document -- very confusing. **D.5.1**

To make a conclusion of my remarks, I would like to say that we are living in the real world. We are attempting to deal with very real problems. This document posits the existence of a never-never land and then proceeds to demonstrate the never-never land might in fact exist in the here and now -- then sometime -- only with the aid of some very questionable assumptions. **S.2 Z.1**

In legal terms, this is an insufficient document, just in terms of discussing housing. It doesn't deal with the impact of 20 million gross square feet of commercial high-rise office building into the poorest neighborhoods of San Francisco. It doesn't deal with the loss and impact on existing low- and moderate- income housing. And it sets out no way in which the housing demand created by 121,000 new workers will in any way be met. **B.4.2 D.2 D.3.1 D.4**

And with that grievous shortcoming, it seems to me that the only possible solution for this Commission is to send this document back to the drafters and ask them to sharpen their Eagle pencils and get work to describe reality as we know it. **S.2**

Thank you.

PRESIDENT ROSENBLATT: Susan Parker, and then Clifford Fred.

MS. PARKER: My name is Susan Parker, 5636 College Avenue in Oakland. I own a small business in Oakland, and I'm Vice President of the College Avenue Merchants Association. **Z.1**

Speaking as a concerned Bay Area resident, there are a few points I'd like to make about this Draft Environmental Impact Report. It seems to me that all the uncontrolled growth you have had in downtown San Francisco over the past ten years has pretty much trashed San Francisco. It used to be a nice place to live. But now traffic conditions are miserable, you can't park anywere, and rents are out of this world, both for residents and small businesses. And now the further growth which your Downtown Plan would encourage is threatening to trash Oakland too. **B.2.2 B.4.1 D.3.3 O E.3.1 E.3.2 E.4.2 Z.1**

Let me bring up just four areas, areas which this EIR doesn't address. First, there is the issue of

BART usage. Throughout the Bay Area, we all pay taxes to support BART. Your EIR shows that BART will presumably increase its capacity by about 90 percent between 1981 and the year 2000. But it also shows that the level of service actually gets worse over that period, that every last bit of peak period capacity increase -- capacity that everyone is paying for, will be sucked up by San Francisco's growth alone. God forbid that any new passengers should be generated by downtown Oakland growth and headed for Concord or Hayward, because none of them are included in your analysis. So, please, fix up your analysis and include demand created by other areas in the region. **E.2.3**

Further, I feel that it's incredibly irresponsible and arrogant for you to assume in this EIR that all of that new capacity belongs to San Francisco, as the tables basically claim. If that is so, then it's also true that all of the costs in expanding BART's capacity should be paid for by the San Francisco developers who are creating and benefiting from the 90 percent demand increase. So I'd like to see you pass a mitigation measure, a development fee to reimburse BART for its expanded costs. **E.2.7.2** **E.2.7.4**

Secondly, we already have our own parking problems in my area of Oakland. They're not really bad yet, but we're at the brink. The Rockridge BART lot is filled to capacity every day. Since this EIR predicts a 90 percent increase in BART patronage due to new San Francisco commuters, that will also probably have a pretty big impact on parking in my neighborhood. There will be a hell of a lot more BART patrons using our streets as parking lots. This has already happened at El Cerrito BART stations. They have to establish preferential parking districts. **E.1.1.2 E.2.3 E.4.3**

The EIR should look at this problem and should develop a mechanism to pay for the cost of preferential parking districts, should they be established in my neighborhood and neighborhoods near another BART stations. I don't think that it's fair that we should have to suffer from both more parking problems and traffic congestion plus have to pay for the parking stickers just because you people in San Francisco can't control your downtown growth. **E.1.1.2 E.2.3 E.4.3**

Third, I know other people have probably talked about this already, but I want to bring it up again. The EIR doesn't talk about the housing problem which San Francisco is exporting to the rest of the Bay Area. The apartment shortage which downtown San Francisco growth is causing is spilling over into Oakland, driving up rents in my area and forcing out residents, especially older people who can't afford to pay. Your EIR should look at that this and you should do something about it. Don't approve one more office building unless you also require that enough rental units are built in San Francisco to meet the demand created by the new office workers. Your Downtown Plan should have a requirement of this nature, a requirement for balance. **D.2 D.3.1 D.3.2 D.3.2.3 D.3.3.6 D.4 P.2**

Lastly, Page IV.B.6 makes it very clear that rents in new San Francisco office buildings are substantially greater than those in older buildings. Rents in older buildings are typically 50 to 60 percent of those in new buildings. That is very clearly driving small businesses out of your downtown and into other areas of the region, causing commercial rent increases elsewhere. Again, take some responsibility for your small businesses. Reverse your Downtown Plan to discourage demolition of older buildings, reduce your allowable density limits. Please address these points in your EIR. **B.4.1**

My comments have focused on Oakland because I am familiar with the problems there. But I am sure that they apply just as well to Berkeley, Marin County and Daly City. I really resent the lack of responsibility which San Francisco City planners have shown to the rest of the Bay Area region, and I don't want to see it continue. Don't dump all your problems on the rest of us. **B.2.1 B.4.2 D.3.2 N.3**

I hope that you will revise this EIR to show the real impacts of your Downtown Plan on the rest of the Bay Area, and then I hope that you'll revise your Plan so that it deals with the problems which you are creating. **B.2.1 N.3**

Thank you.

PRESIDENT ROSENBLATT: The Commission is going to have to take a very short recess before we have your testimony. We ran out of paper on the court reporter's transcript. About a five-minute recess.

[Short recess]

PRESIDENT ROSENBLATT: Ladies and gentlemen, can we reconvene, please? All right.

MR. FRED: My name is Clifford Fred, and I am speaking for a group in Berkeley called the Milvia King Alliance, which is an urban environmental group that is concerned with large-scale development that is being proposed and constructed in Berkeley, San Francisco, and throughout the Bay Area. **Z.1**

My comments on the downtown San Francisco EIR will concern the Downtown Plan's impacts on Berkeley, the regional impact, and, from a Berkelian who used to live in San Francisco, my concerns about the impact on San Francisco. **Z.1**

First, Berkeley. I think the thing that comes to mind is the fact that Berkeley has a camp that it operates in the Sierras called Tuolumne Camp that it's operated for generations. And the City and County of San Francisco is intending to flood that camp to expand Hetch Hetchi Reservoir so that your City can have more water to accommodate all this development. So, just off the bat, that biases me and us against continual massive development in San Francisco. **O**

In Berkeley, in the last two years, we have had over one million square feet of development approved or constructed in our downtown area. Now, that may not be a lot compared to the 36-some million square feet in San Francisco in the last 19 or 20 years, but it's a lot for Berkeley. And we are going to continue to have a large amount of development -- how much, I don't know. **B.2.1** **Z.1**

Oakland has several million square feet of office development planned for its downtown that is going to have parking, traffic, and gentrification effects in the East Bay. Throughout Alameda and Contra Costa County, there is this unprecedented wave of massive development, both commercial and residential. **B.2.1** **Z.1**

All the impact of all this proposed and happening East Bay development is not really looked at at in your Downtown EIR. We need to know the effect on Berkeley and the East Bay from all the development that we're experiencing and are going to experience combined with all of the development that is being planned here in San Francisco. **B.2.1**

Other speakers have spoken about the housing impact, the fact that San Francisco will not be building housing for the 100,000 new office workers that you will have in San Francisco by the year 2000. Well, part of the people are building housing in the East Bay, on the other side of the Berkeley Hills, but in the process, they are taking away what's left of the open space in the East Bay. **B.2.2 B.6 D.3.2.4**

Los Potetos is a new town proposed near Livermore that would house 40,000 people. That would eat up thousands of acres of the remaining open space in the East Bay. Another housing project, Discovery Bay, 2300 acres, out near Byron in the Delta. There is an 886-acre new town called Manzanita that is planned for Solano County. There is a 2300-acre housing project called Gumbert Ranch that is planned for San Ramon. And there is the Harbor Bay Isle, a 900-acre housing development in Alameda. **B.6 D.3.2.4**

All this housing is being constructed because of the massive increase in office jobs in San Francisco and proposed for San Francisco as well as the new office jobs in downtown Oakland. But the trend is, the more development you have in San Francisco and in Oakland, the more you see what's remaining of our valuable open space being eaten up with huge, sprawling housing complexes. **B.6 D.3.2.4**

So this impact is not looked at at all in your EIR, and it really should be before the EIR is certified. Similarly, there are many huge commercial complexes being proposed and built in the East Bay. The largest is the Hacienda Business Park, 586 acres, 20 million square feet of development that will be constructed in Pleasanton in the next 15 or 20 years. **D.3.2.1 D.3.2.4**

There is the Bishop Ranch office complex near San Ramon that was written about in the Chronicle a few months ago. That is eight million square feet of development. There is the Ardenwood Forest, which is several hundred acres -- I am not sure how many square feet of office, a huge office complex in Fremont. Again, all this commercial development is going to have an impact on the tight housing situation in Berkeley and in the East Bay in combination with all the development, all the commercial development proposed for downtown San Francisco. **D.3.2.1 D.3.2.4**

On housing, really, we in Berkeley are going to be getting it from three directions. We are going to be having an increasing crunch on our already tight housing situation in Berkeley from downtown development in Berkeley; from the proposed Sante Fe Southern Pacific Office Development of four million square feet of development on our waterfront; from all the office development in Oakland and on the other side of the Berkeley Hills, plus all the development that is happening in San Francisco. **D.2.3 D.3.2.1 D.3.2.3**

Most of those people -- in fact, the EIR predicts that most of those people would be living or looking for homes in the East Bay. Plus, as San Francisco is gentrified, as the new, more up-scale workers and higher prices displace the lower-income people in San Francisco, these thousands of people are invariably going to be looking toward Berkeley and toward Oakland for their housing. **B.4.2 D.3.2.3**

So our housing impact is coming in three directions. And this should be in the EIR. You see, your San Francisco Downtown Plan, it's not just a San Francisco Downtown Plan, but because of the magnitude of it, it's really a regional plan; it's a bay region plan that you're pretending is only a San Francisco plan. But you've got to face the fact that it is a regional plan, and you should be going out to the San Francisco region and not forcing people like myself to kind of find out about this by chance, but you should coming to Berkeley, coming to Oakland, going to Marin and south of San Francisco, going to the city councils and planning commissions and making presentations and urging them to have their own public hearings, and you should be getting all this input from throughout the Bay Area and get that into your EIR and work into the final EIR if you want this to be a serious and honest EIR. **N.3 S.1.1 S.1.3**

Again, I talked about open space. The open space is being eaten up at a historically high rate, something like 40,000 acres a year now in the Bay Area, according to People For Open Space. San Francisco's continual massive development in its downtown will only increase that rate. That needs to be looked at. And, at the same time that we're losing open space because we are gaining so many new office workers and residents in the Bay Area, the demand for park land, for open space, for unspoiled areas where people can go to get away from it all, can go and recreate, that demand is increasing. But that is not in your EIR. That should be in your EIR. What is the effect on the bay regional need for recreational open space as resulting from your Downtown Plan? **B.6 D.3.2.4**

A brief comment about jobs. In Berkeley, one of the rationales for massive development is that it brings needed jobs. I am sure that rationale is being used in San Francisco too. But the majority, the great majority of new office jobs in Berkeley aren't going to Berkeley residents, in Oakland aren't going to Berkeley residents, and, I understand, in San Francisco aren't going to San Francisco residents. They tend to be going to people from other parts of the country who are lured here by these new jobs. They tend to be getting the jobs, and the people who live in Berkeley, Oakland and San Francisco are tending to be displaced by these new jobs and these new office workers. **B.5.3**

If you want to take care of the people in San Francisco that don't have jobs, then target new jobs to San Francisco residents and have a serious plan to get jobs that turn over to San Francisco residents. In fact, I think about 90 percent of all job opportunities come from turnover in existing jobs, not new jobs. So if you want to take care of unemployment in San Francisco, you've got ten's of thousands of jobs here now. You've got a huge turnover every day. Target the people who are unemployed, find out their needs, find out what they can do, train them, and get them working in San Francisco's already booming economy. **B.5.1 B.5.3**

Finally. I used to live in San Francisco for about a year, then I moved to Berkeley. And though I don't come to San Francisco regularly, when I do come, whenever I do, I just feel very sad seeing that the City that was here when I first moved to the Bay Area ten years ago is no longer here, it's completely different. The downtown is completely different. The people, the mixed income, the mixed ethnic and cultural San Francisco that I knew when I lived in San Francisco several years ago is rapidly disappearing. **Z.1**

Just for your own sake, before you approve this EIR and before you go ahead with this massive development plan, look at serious alternatives, get a good planner to analyze a no-growth alternative or a very modest growth alternative that targets jobs and targets housing availability to the people who need them, not to people who wouldn't be moving here if it weren't for all of the massive development that's happening here. **Q.1 Q.2 Q.4**

Thank you.

VICE PRESIDENT NAKASHIMA: Next is Gray Brechin and then Dee Dee Hepner.

MR. BRECHIN: I am Gray Brechin, and I'm

speaking as a citizen of San Francisco. And I didn't really want to be here today playing Cassandra again. But on Tuesday we had an event, a shake in San Francisco and throughout the Bay Area that was really just a warning again of what could happen. And I thought this would be a proper forum to discuss that in. **Z.1**

As I heard from friends in the downtown, people in high-rises panicked. There was glass coming out of some of the buildings down there. And I hear that some people quit their jobs down there, which is, as far as I am concerned, the smartest thing that anybody in the downtown could do. And a lot of people apparently took up smoking again. **K.1 K.4**

Now, the Environmental Impact Report does admit that the scenario for a quake in the downtown is going to be pretty grim. I think that it could be much grimmer, actually. And I would like to see it get grimmer so the people actually have a chance of knowing what continued high-rise growth in the downtown can actually result in. **K.4**

I must admit, it's extremely honest. I've got to give it credit for that; it does admit that market forces dictate that the growth will continue despite any rational concern for human health or safety in the downtown. And I really do think that is admirable that they actually admitted it. It says that in plain English for anybody who has wondered whether the economy serves us or whether we serve the economy. I think that that really sort of puts it down in black and white. **K.7**

Now, what could the seismic considerations be? Well, they're pretty ghastly as they're reported there. But my chief question is: "Where is the fire," as the highway patrolman says as he pulls you over. Where is the fire going to be in the downtown, in the Environmental Impact Report? What did we go through 1906 for? You don't just have earthquakes, major earthquakes in a wooden city and then just sort of everybody goes back to their business. You have fires. You can have fires right away. Now, this is a wooden city, except that the downtown is largely made out of plastic and paper, with a lot of people and floppy disks mixed in too, and threaded through all of this are gas mains and a lot of automobiles. **K.2**

So I think there has to be consideration in the Environmental Impact Report of the real danger from fire, of the deaths and injuries that could result in that, because it could be considerably worse than the picture that is painted in the Environmental Impact

Report. And, as a matter of fact, the danger of fire is extremely high now. It's probably much higher than it was in 1906. **K.2**

In the mild quake that we had on Tuesday, a shopping center in San Jose burned down from a broken gas main. What if there had been one fire on Sutter and Montgomery Street and the streets had been blocked with rubble, as the Downtown EIR says? Except that the chances are that we'll probably have fires all over downtown. **K.2**

Specifically, what is the danger of fire from automobiles, especially as they are hit by material, by cladding and windows coming down off the buildings? What is the danger from broken gas mains? What is the danger from leaking PCB's in the downtown from transformers? What is a realistic appraisal of the death and injuries that could result in that event? **K.2**

And also, what if there was a fire in one of the underground garages underneath the high-rises in the downtown -- for example, in Embarcadero Center, where there are about three or four floors of garages? Would it be possible, if there was an uncontrolled fire in that, that the high-rises' structural integrity could be so damaged that the building might actually come down? **K.2**

Well, that is all pretty grim. But to go back to other seismic risks, what is the likelihood that high-rises such as Shaklee Terrace, which is flush with an adjacent high-rise for 20 stories, what is the danger that a building like that, two buildings like that, could demolish one another in the event of shaking because of oscillations? We have seen more buildings like that. You might consider 101 Montgomery Street, for example. We're seeing more high-rises being built flush with one another. **K.1**

Under Tsunami's, it does state that there is a possibility that there could be a runup from the Tsunami from in San Francisco to Front or Battery Street. What is the likelihood that water could invade the BART and Muni Metro tubes down there? Well, there is really not very much we can actually do about that if that happens. **K.3**

But finally, and of most concern, under mitigations we come to emergency services. The EIR paints a grim picture of what the seismic danger would be. But as I understand it, the emergency services in San Francisco, particularly the Fire Department, are already inadequate to handle the crisis that will result from that major quake. What additional emergency services will be required? Will all of this growth require, as I think it must, massive additions to emergency services in order to deal with this danger? And specifically what would be the cost of adequate emergency services? **K.2 K.5**

Finally, I would suggest that the Commissioners have a meeting with the Office of Disaster Preparedness here in the City and particularly with the Chief of the Fire Department to discuss what the probable effects will be of an earthquake on the City and what you Commissioners can do in your planning to try to mitigate the effects of that quake, specifically the effect of a fire. **K.6**

Now, I have been a frequent critic of the Planning Commission. But I urge you to do this in good faith because it seems to me, especially after Tuesday, we're all in this together when this thing happens. And we can no longer afford to see downtown just as a collection of individual buildings, because they are all interconnected, and we can all go down with it. It seems to me that we are sitting on a time bomb down there, and this must be honestly considered in the Environmental Impact Report. **K.6**

Thank you.

VICE PRESIDENT NAKASHIMA: Mr. Breckin, Mr. Salazar has a question for you.

COMMISSIONER SALAZAR: Actually, you answered my specific question, which was: What would you do? And what you said is that we ought to get together with the Disaster Preparedness and Fire Department, which is something I would like to ask our staff to respond to -- not now, but at our next meeting. What has been done along those lines? **K.6**

My gut feeling, though, is that there is very little we can do. **K.6**

MR. BRECKIN: It seems that as the growth proceeds, and the reason that I bring this up is that it's the nature of government for agencies to not talk with one another, and this isn't simply a matter of building buildings, but that, in a way, we are increasing the danger all the time. We can lessen the probable danger. And it seems to me that the Downtown EIR or or the Downtown Plan as it is now will radically increase the danger. As a matter of fact, the Environmental Impact Report states that. What can we do to decrease the probablity of that danger? And I think that you could probably do a great service by talking to the Fire Chief and finding out just what you could do. **K.6**

Thank you.

COMMISSIONER SALAZAR: Thank you.

VICE PRESIDENT NAKASHIMA: Dee Dee Hepner.

MS. YEE: Dee Dee Hepner had to leave, and I'd like to present her testimony for her. My name is Leslie Yee, and the last name is spelled Y-e-e. Z.1

It was not long ago that more than 950 55-gallon drums with toxic chemicals exploded on Pier 70 -- cyanide, arsenic, PCB's were propelled by prevailing southeast winds drifting into Potrero Hill and the South of Market area. Motorists and walkers were told to go for cover. L

In January, 1983, a fire marshal at Warehouse 6 discovered 200 times the normal level of PCB's in rat-infested barrels. There are over 1,000 PCB-contaminated transformers such as those that led to the fire and quarantine at One Market Plaza last May. L

Now a $75,000 Commission study to determine the level of contamination and location is in progress and should be finished in several months. This data should be used before committing to any long-term building program. There are over 389 underground tanks. There are many others operating without permits in this City. And this doesn't include gas lines, such as the one that ruptured last December in Noe Valley. L

It is an outrage that the Downtown EIR considers the task of environmental impact completed.

Is not the environment impacted by toxic explosion, ground water contamination, underground leaking, and air pollution? Why isn't that data collected in the EIR?

Up until recently, San Francisco has not considered itself at risk from toxic chemicals, but accidents from earthquakes pale next to the exposure from a spill or explosion. And the combined effect of an earthquake on underground tanks or gas rupture is terrifying. Does the report detail what tanks and gas lines are underground in the proposed area? Does the report assess the quality, lining, permits, and containment structures underground? It should. It is irresponsible to bring thousands of new workers and visitors to the area without knowing this information.

What would have happened if the One Market Plaza incident had occurred on a weekday? Does the Commission think that these toxic incidents are isolated incidents? In 1982, 48 tons of organics including benzine, toluene, asbestos and vinylchloride were spewed into the air. This far exceeds the limits set by the Bay Area Air Quality Management District. **I.5**

Within the year, new compliance guidelines will be established. Have they commented or been involved in the Downtown Plan? These hazards and the immense cleanup bills and lawsuits recently stimulated the passage of the Hazardous Materials Permit and Disclosure Ordinance. This represents a shift from reaction to prevention. All businesses handling significant quantities of hazardous materials will soon be required to report inventories to the Fire Department. L

Finally, we will have an industrial profile enabling planners to make intelligent decisions about building and land usage. This data, along with data from the Bay Area Air Quality Management District, the Department of Public Works and others, should be sought and additional hearings held on the question of environmental safety. **1.5** **L**

Frankly, without this information, we are putting thousands of people in needless risk. The frustrating part is, we are talking an investment of time and money to prevent disasters compared with millions of dollars in cleanup, lawsuits and medical costs. This expensive bill has been the legacy for several California cities. This is a disaster served up on a silver platter. If we don't begin to take these risks seriously, there will not be any environment to write impact reports about. L

Thank you.

PRESIDENT ROSENBLATT: Thank you. The next speaker is Marilyn Smulyen, and then Norman Rulfe.

MS. SMULYEN: My name is Marilyn Smulyen, and I'm here to speak for Supervisor Nancy Walker. We don't have any testimony prepared today because we have always been told that Board members cannot testify in front of the Planning Commission. **Z.1**

And about two weeks ago we asked the City Attorney for a formal ruling as to whether or not that was the case. I was just informed about an hour ago that there is an opinion that's been written and has not been transmitted to us yet that says in fact that we can testify on the Draft EIR. And therefore, Supervisor Walker would like to request that the Commission definitely hold another hearing on this so that our office as well as the office of any other interested supervisor will be able to testify before you. **S.1**

Thank you.

PRESIDENT ROSENBLATT: Norman Rulfe, please.

MR. RULFE: Mr. President, members of the Commission, I am Norman Rulfe, Chair of the Transportation Committee of San Francisco Tomorrow. And to tell you the truth, I really haven't completed studying the EIR or even the transportation parts of it, the transportation impacts and mitigation measures of the Plan. **Z.1**

However, I do have a few comments to make right now, and I hope to give more comments at the subsequent hearing, which I certainly do urge you to hold. **S.1**

The first thing that occurs is a series of questions regarding parking. Now, the Downtown Plan says that any new long-term parking should be located in the periphery of downtown. It's a bit schizophrenic there, because it also calls for discouraging new long-term parking in and around downtown. **E.4.1**

The manner in which the Plan and EIR addressed themselves to parking leaves many unanswered questions which must be addressed in the environmental review process. Among them are the following: Define what is meant by the periphery of downtown. What are the proposed locations of peripheral parking, both the long-term and short-term? What present usage would be displaced by this peripheral parking? What would be the effect on parking for C-3 District employees if additional areas institute residential permit parking? What effect would this have on the automobile circulation in these neighborhoods, in downtown? What effect would it have on Muni and other transit system ridership? What would be the effect on automobile traffic if no peripheral parking is constructed and/or if loss of long-term parking in the downtown core is not replaced? What if Mitigation Measure No. 27 -- that's to make downtown an automobile control zone -- is adopted? What effect would this have on parking demand? Describe how Mitigation Measure 27 would be implemented. What if Mitigation Measure 27 is implemented, no peripheral parking is constructed, and residential permit parking is instituted in surrounding areas? Discuss the effects on parking demand, traffic, and transit patronage. And how can the Plan reconcile the expansion of the Sutter/Stockton Garage with the express desire to reduce automobile traffic in the C-3 area? Another small example of the schizophrenia that the Plan suffers from in areas. **E.2.2.3 E.3.2 E.4.1 E.4.2 E.6.3 E.6.4**

In the EIR, it says that traffic conditions were studied in ten intersections in the C-3 area. Well, there are a lot more than ten intersections in the C-3 area that are going to be affected by these proposed developments. What about these other areas? How many more intersections will go to the level of Service E or F? And don't forget, there isn't just the C-3 area that's affected by all this; all the surrounding areas. There are many parts of town that are not exactly surrounding the C-3 area that will be affected by the traffic generated by the development called for in the Plan. And, of course, we have heard some of our friends in the East Bay say, "You know, it isn't just the City that's affected by that." **E.3.1 E.3.2**

Now, the same clogged intersections, or this "gridlock," to use the current term, are also going to affect transit service. There are going to be delays to the transit vehicles that are operating on those streets. **E.2.2.3 E.3.2**

Now, the EIR says something about that, but it doesn't say much. It doesn't get specific or quantitative about it. So that's another defect. You have got to go back and get an estimate of exactly what the delays are. For example, how many vehicle hours, how many passenger hours are going to be lost because of the delays at these clogged intersections? What's that going to do to transit operating expenses, and so on? **E.2.2.3 E.3.2**

I should add, by the way, that it's also going to require a lot more transit capital if you have these clogged intersections, and the buses, or whatever vehicles are there, can't get through because it's going to take increased running times, and it's going to take more of them to give any given level of service on a given line. **E.2.2.3**

The analysis of the impacts is made assuming that all the projects and all the transit systems are carried out and the five-year plans of all the transit systems involved in the Bay Area are carried out. But what if they are not? There is no guarantee that the money is available. And, in fact, it looks right from the study MTC has made that it won't be available to carry out everything that is in all the five-year plans of all of the different transit systems. An analysis should be made of that, of how much of that could be carried out and what the impacts would be with that. **E.2.1.2**

But then, of course, we should also be **E.2.7** **E.6** optimistic. Let's suppose that we cannot only get the five-year plans, but perhaps what other additional measures might be. For example, the new rail starts include a lot of things that are beyond the five-year plans of these transit systems. So, that sort of thing should be addressed, the effects of all these various transit projects on the development plan and vice versa, alternates and so forth. **E.6** **E.6.2**

Well, as others have remarked, there certainly are some regional impacts. It isn't just the C-3 area, and it isn't just other parts of San Francisco. It's the whole Bay Area that's affected by these developments, as far as the transportation impacts and the other impacts have been developed. **E.1.5**

That is as far as I have gotten so far. As I say, I do hope to come back with some more after I study some more, but I think just right there, I pointed out some pretty glaring defects, deficiencies in the EIR which have got to be addressed, have got to be included. And I'll be seeing you later, I hope. **S.2**

Thank you.

PRESIDENT ROSENBLATT: The next speaker is John DeAmonte, and then Sue Hestor.

MR. YORI WADA: Mr. Chairman, members of the Planning Commission, I would like to address myself to a single point of many raised by the EIR on the Downtown Plan, and that single point is this: I find the central assumption of the Downtown Plan and this EIR deeply troubling to me. That assumption is that by expanding the area devoted to high-rise office buildings, we shall be able to solve the economic and, by implication, the social problems that will face this City over the next two decades. **Z.1**

The Downtown Plan and this EIR takes as a central focus its primary assumption that by building some 20 million square feet of new high-rise office buildings South of Market, the employment needs of our

City's residents will be met. I find that assumption deeply troubling. **B.5 B.5.1 B.5.3 B.5.4**

While I believe that we have a middle course between unlimited growth and the stagnation of no growth, I nonetheless remain not convinced that our only economic future rests in the accomodation of endless high-rise office buildings that go from Russian Hill to Hunters Point. **B.2.1 Z.1**

There is no convincing evidence set forth in this EIR that demonstrates that such a southward march of downtown will meet the employment needs of our young people coming out of our high schools and our community colleges or those individuals who are presently unemployed or underemployed. **B.5 B.5.1**

Indeed, this EIR seems to indicate that the neighborhoods of small businesses and people in need of economic assistance will be pushed out of our City by the southward march of high-rise buildings. What about the housing needs of residents and the small businesses South of Market which will be demolished or relocated to make room for this new development? I ask this question of you and hope that you will ask staff this also. **B.4**

Almost not a word of this EIR is devoted to the displacement of both residents and small businesses which will happen if the Downtown Plan's vision of the future is allowed to happen. We must not plan to become a high-rise office building economy only, as the EIR and Downtown Plan assumes. For, in doing so, we will in fact seriously harm our City and its present residents. **A.1 B.4 D.3.1**

San Francisco is a city of great diversity, of many cultures and many peoples from many different lands. Ways must be found for our residents to make a living in this City in which they reside. To assume that we can only have office jobs in the future, as the EIR does, is to assume that our City's rich human diversity is in danger. San Francisco must plan its future based upon its past and its present and its future. We have been and we are a wonderfully diverse city of many peoples from many different lands. **A.1**

We must plan for that diversity in the future or we will contribute to the deterioration of our diversity which we value so much. That means that we must plan for a variety of economic uses, not just high-rise commercial office buildings, as does this EIR and the Downtown Plan. **A.1**

In technical terms that I am hesitant to talk about, then, I find this EIR incomplete, for it ignores economic diversity, which is the bedrock of the human diversity of our population. I urge this Commission and its members and its staff to accept the challenge of our City's past and plan for diversity -- small businesses, affordable housing, cultural centers, blue collar industries, and new neighborhoods of new neighbors from Asia and Latin America, all of the rich human potential that is our City today. Accept the challenge of our past and plan for a future that has room for the diversity that is the heart of a great and living city. **A.1 S.2 Z.1**

Thank you very much.

PRESIDENT ROSENBLATT: All right. The next speaker is Sue Hestor, to be --

COMMISSIONER BIERMAN: Can I say something?

PRESIDENT ROSENBLATT: Sure.

COMMISSIONER BIERMAN: I was going to say it earlier, before the meeting started, and then I decided not to, but I'd like to say it now, and especially just after Mr. Wada has spoken. **Z.1**

I would just like to sort of pay tribute to people in the City who still keep caring, and the new people coming along who care, and the people who have spent enormous time the last month or so meeting and talking about this EIR. I think the staff has tried valiantly, and our Chairman, to come up with a plan that is right for the City. And whether it is the plan that we should do or not, I don't know. I have problems about it. But I know the efforts they have made. **S.1 Z.1**

But without the public who will come and who will spend their time, hour after hour, sitting here, and particularly give the philosophy of a city like Yori Wada always can, we would really be in trouble in San Francisco. And I hope that we are up to what everybody is thinking about and asking about today.

[Applause] **S.1 Z.1**

MS. HESTOR: Sue Hestor for San Franciscans for Reasonable Growth. I think I am the first speaker technically from SFRG today, though I like to consider lots of the people here to be our members, and they are, really. **Z.1**

You have heard a lot about the omission of the impacts in the East Bay and areas outside of San Francisco. I want to emphasize some areas that are omitted in the City that really need to be factored in.

B.2 D.2.3 D.3.2 E.1.5 E.2 E.3.3 E.4.3

The exclusion of the Mission Bay Project and the exclusion of development south of Folsom Street is untenable in this. What we in reality have is two downtowns already, given your definition, and the downtown in the C-3 District and the downtown in the

C-2 district to the north of the C-3 District, which isn't factored in, everything north of Washington Street. And we have two new downtown areas to the south, that which you have in this EIR and that which you don't have in this EIR. **B.2.1 D.2.5 E.1.5 E.1.9 N.2**

And I don't talk to Southern Pacific, but I read the newspapers, and apparently they're very twitchy about this plan subverting their efforts in Mission Bay. Well, that may be their fear, but we need to know, if Mission Bay is some sort of a reality, what additional impacts, what additional stresses will there be on housing and transit and traffic patterns as well as on the economic dynamics of downtown offices. So, whether or not you think Mission Bay is a reality, it certainly has been going through a public process for the past couple of years, and a lot of people in this room have been meeting with developers from Southern Pacific. So you can't ignore it. Please add in Mission Bay as a factor as well as all of the warehouse conversions, factory conversions, and new development that exists south of the C-3 boundaries in the M District. **B.2.1 B.4 D.2.5 E.1.5 E.1.7 E.1.9 N.2**

One of the things that I find disheartening is the new economic projection model that hasn't really gone through public testimony. It's very hard to focus on that in the context of these EIR's. But one of the factors that I find slightly misleading in the new economic projections is a downplaying of the reality of the West Coast and flight capital. There are a lot of engines moving development in San Francisco, and a lot of it has to do with economies that are shaky outside of the United States and, you know, five, ten, 15,000 miles away. So there is going to be, as pressure from Hong Kong continues and as people are very twitchy about expansion, you know, getting their money out and just getting it somewhere safe, and real estate in California and real estate in San Francisco in particular is considered a safe investment. So there are all kinds of other factors going on. **B.1 B.1.4.4**

One of the other parts of the economic analysis that is missing is a real cursory attention paid to what has happened in the past couple of years. This EIR has all kinds of assumptions because it was started in 1981, and there was a projection to 1984. And 1984 hasn't been measured. And that is very confusing to the public, who thinks that what you are talking about as the current state of affairs in 1984 is the current state of affairs when they go out the door -- it was done with slide rule and pieces of paper and calculators extrapolating from 1981. **B.1.1 E.1.2**

You need to put into context what has happened in the past couple of years, not only lists of development, but a list that shows number of square feet approved every year -- and not just by the Planning Commission, but the amount of square feet that has been approved anywhere in the City that is commercial office development and hotel development -- by the Redevelopment Agency, the State, like the State Building, or this Planning Commission or other entities which have the power to approve without coming to this body. Tell us, since 1965, what the rate of approval was, and simultaneously tell us how much came on line.

B.1.1 B.1.2

I don't find the tables particularly helpful when they show projects coming on line in 1983 that I know are still under construction, because your Transportation Analysis may have those buildings factored in, and the impacts for those buildings won't be felt until this year -- for example, Citicorp, 101 Spear, Bank of Canton. Those tables need to be revised to be brought up to reality in 1984, as of right now. **B.1.1**

One of the places where that revision needs to be done is all the tables in the appendix. The table in the appendix dealing with landmarks, I found very disingenuous because it has buildings as existing and not threatened that you have already approved projects for that are going to demolish them. You need a 1984 landmarks list that shows the current state. And also, I think, to put it into context, where the buildings have been approved for removal or modification or whatever, the years, so that we can see the pattern. Has there been an accelerated loss of landmarks in the past five years? Maybe that table will be a little damning, but I think you need to have it so we understand, the public understands the context of loss of historic buildings. **H.1.1**

You have incorporated by reference the Downtown EIR Consultant's Report extensively, yet that document has not had the benefit of the formal EIR process. I am therefore asking that to the extent that you have public hearings on that, and I don't believe there was a court reporter here for those hearings, you have someone transcribe those tapes and respond to them. Because once you grandfather that document in, when you have public comments in the EIR process, you'd best answer those public comments. And I haven't seen any responses to comments that were given on the Downtown EIR Consultant's Report. So please transcribe those tapes, if they're not transcribed, and incorporate those comments. I made comments; Mr. Jones made comments; Mr. Imparato made comments; other people made comments. **S.1.1 S.1.2**

This is a formal CEQA request, that you respond to all of the comments on the Downtown Plan Consultant's Report as though they were made at this hearing today, so we are incorporating our comments by reference. **S.1.1 S.1.2**

Also we are demanding that all of the reports that were made, that we were unable to get as part of the Downtown Plan -- pardon me, the Downtown EIR report, in particular the Recht Hausrath economic report that went through the parcels and figured out profit factors, which we were told is a confidential document. Now you've incorporated the Downtown EIR Consultant's Report and you are incorporating their economics. You cannot keep those hidden any longer. **B.1.4.10**

We figured out the profit rate on those parcels that Recht Hausrath did and tested them and called them up and were told that we still -- "Yes, our figures -- Yes, when you did the calculation, yes, it showed that profit factor." I think the Commission and the public need to see that information, which is part of the Downtown EIR Report. And if you don't, you are going to have the alternative of striking the Downtown EIR in all aspects. You either have to legitimize that document as an EIR and release every bit of that information or strike it totally and don't rely on it. As of right now, those two documents are so interwoven -- and one of those is a secret plan and has secret documents that are available only to the project sponsor, which is SPUR and the Chamber of Commerce, that we don't know what's going on. But that economic stuff is very important to us. **B.1.4.10**

Finally, I have a mitigation measure that I want included in this plan, and I think it's a practice that you need to adopt in the next month as you go through the comments. The City of San Francisco should, once a year, make an evaluation of how much office space is it likely to consider in the next year; how much housing demand will be generated; where that housing demand will be; how much transportation demand, freeway capacity, transit demand -- looking at it on an annual basis, then notify every other county and every city of any size, how much they are going to have to provide to accommodate the office development that we project. **P.3**

San Francisco should be telling Danville, Lafayette, Berkeley, Oakland, San Mateo, everywhere else, how many housing units they're going to have to add to accommodate the amount of office space that we are intending to consider approving. You should do that right now for the period between 1984 and the year 2000. Let Contra Costa County know how many thousand housing units they are expected to provide formally. Send it to the highest political body as well as to their Planning Department. Tell their City Council or their Board of Supervisors. Tell their Planning Commissions and ask them if they're willing to do it. That is what planning is about. **P.3**

I am therefore requesting as a permanent mitigation measure in the Downtown Plan an annual evaluation of those demands in telling them how much the rest of the region is going to have to provide and asking them to respond. Are they thrilled about having to provide that additional transit, those kinds of roadway expansions? Can they meet those housing demands that we're placing on them? Because as of right now, one thing that bothers me is the lack of official government representatives and official government responses. I don't know who got this EIR. I don't know if the Oakland Planning Commission got it. I don't know if the Contra Costa Planning Commission got it. I don't know if you sent it to those bodies to whom we are making those demands. But the only honest thing to do is to tell them and ask them: Can they do it? **B.2 D.3.2 E.1.5 E.2 E.3.1 S.1.3 P.3**

If you don't have that kind of response, you are dealing in wishes. You're presuming that the housing is going to be available somewhere and it's their responsibility. D.3.2 P.3

A phrase that I heard last weekend, which I didn't originate, but I think is really great is: Theft of capacity. That, I think, is what we are in the position of doing. We are stealing other people's capacity. We are saying to the other counties: We are taking all of your BART capacity. We are taking all of your roadway capacity. We are taking all of your ability to put additional people on the bridge, and we are sure taking your housing capacity and your park capacity. And I think we have the responsibility to put that in. B.6 D.3.2 E.2.3 E.3.1 P.3

My final, final comment is that the growth-inducing section of this EIR stinks. This much on one page (indicating) is not an analysis of growth-inducing capacity. We are an engine that pushes a region, that pushes all of Northern California development, development that puts demands on water resources, that puts demand on PG&E capacity and nuclear power plants, puts demands on all kinds of things that are scoped down to this EIR. And it is an indictment of this City if we don't understand that how we push, push, push is going to induce regional growth and induce, you know, all of Northern California growth. And I think you need to go back and do a honest growth-inducing chapter. And the chapter really needs to get into those really hard, tough things. And if it's less than 20, 35 pages, it's not sufficient. And half of a page sure doesn't make it. **O**

Thank you.

PRESIDENT ROSENBLATT: The next speaker is Carl Imparato and then Grant Dehart.

MR. IMPARATO: My name is Carl Imparato, San Franciscans for Reasonable Growth. We have about 30 pages of comments on this downtown expansion plan EIR. It's extremely difficult to thoroughly analyze all the new growth and transportation models, so before you here we will just summarize the main points and hope that you will have the courtesy to read those comments when we do submit them to you in writing. **Z.1**

If I were cynical, I'd call this document a cover-up. But let's just say it's deceptive and misleading, and more for what it doesn't say than for what it does say. **S.2 Z.1**

First of all, we have a massive plan, a plan for 91,000 more downtown workers in the C-3 area alone, and another 75,000 workers due to non-C-3 expansion in

San Francisco. It's a massive amount of growth. But the EIR reads as if there weren't any impacts going beyond the county line. **E.1.1.2 E.1.5 E.2 E.3.1 E.4.3**

Where is the description of the massive traffic jams? There isn't any. Where is the analysis of transportation and transit improvement costs? It's billions of dollars. There isn't any. Where is the discussion of all the rental units that the region is going to need? There isn't any. Where is the discussion about all the types of jobs that San Francisco residents really need? There isn't any. Where are the mitigation measures for all of these impacts? There aren't any real substantive ones. Where are the real issues addressed? The answer is, they aren't. **B.5 B.5.1 D.3.1 D.3.2 D.3.2.3 D.4 E.1.4.1 E.2.1.2 E.2.7 E.3 P**

Let's start with the growth rates used in this EIR, since that is really where most the problems crop up. First of all, the baseline growth rate that you use in this forecasting methodology here is 1.7 million square feet per year. That's what the growth rate was in the Seventies. But in the Eighties, the growth rate has been two and a half million square feet a year, according to the EIR. What justification is there to go back to the 1970 growth rates? None, except for the fact that the impacts would be 50 percent greater if you used the real, current growth rates for your projections. **B.1.1 B.1.2 B.5**

Secondly, growth outside of the C-3 area but in San Francisco is never really analyzed properly. Now, the EIR admits that in the Nineties, non-C-3 San Francisco growth will accelerate, and that it will be equivalent to about 80 percent of the C-3 growth. And that means you should almost double the transportation impacts, for example. But the EIR instead, looking for the non-C-3 growth impacts, uses historical growth rates. And those historical growth rates are much, much lower than what is projected for the future. **B.1.1 B.2.1**

E.1.1.1 E.1.5

Just one example of using the historical growth rates. The EIR states that there is no contribution to traffic growth on the Golden Gate Bridge and on the Bay Bridge from all this non-C-3 growth that's going to happen in the next ten years. 75,000 more workers in the non-C-3 area and not one more car generated on the bridges? That is a problem.

E.1.5 E.3.1

Thirdly, with regard to regional growth, I don't know if the EIR authors have ever heard about the buildings going up in downtown Oakland or along Highway 101. There are lots of EIR's out about them. But that growth should be considered. And why should it be considered? Why should we start looking at regional impacts? Well, the reason is that San Francisco's growth is going to have a dramatic regional impact itself. And contrary to what the EIR says or what it implies, we can't behave as if all the remaining freeway capacity in the Bay Area, all the new transit capacity in the region is going to sucked up by San Francisco. It is absolutely necessary that the EIR include growth projections in the base case when looking at the impacts of 165,000 more San Francisco workers on the region. **B.2.1 D.3.2 D.3.2.4 E.1.5 E.3.1**

So, in summary, the EIR analysis should be revised to include a higher growth rate for the C-3, all of San Francisco's growth, and regional growth. And to not do this, we believe, defies the intent of CEQA. **B.1.1 B.1.2 B.2.1 E.1.5**

Regarding transportation impacts, the analysis is completely inadequate. It is based, first of all, on those false growth rates, and then it's based on unsubstantiated assumptions which hide and minimize the impacts, and then it doesn't tell us what the impacts are. So let me elaborate. **B.1.1 B.1.2 B.2.1 E.1.5**

First of all, no regional growth is included in the base case loading on regional transportation systems. Second of all, most of non-C-3 San Francisco growth isn't included. As I said before, not one more car on the Bay Bridge from all the South of Market, North Beach growth. And third of all, the real C-3 growth rate isn't used in the baseline analysis. **E.1.1 E.1.5**

The next thing we come to is the case of the phantom commuters. I guess a lot of the consultants must read the Examiner, because there are thousands and thousands of phantom commuters in this EIR. And despite a 51 percent increase in the number of East Bay commuters, there is only a one percent increase projected for peak hour Bay Bridge traffic -- despite a 50 percent increase in north bay commuters, a six percent increase for traffic on the north bay. Now, what's going on here? Well, what happens is that the EIR says: Well, the freeways are at capacity. The bridges are at capacity. So, really, we aren't going to have more traffic coming through in the peak hour. **E.1.5 E.2 E.3.1**

And that is reasonable. But what it really ought to tell us then is how much longer the peak hour is going to be, because the situation is going to be a lot worse in the future than it is today. **E.1.4.2**

The EIR can assume that more people are going to take transit, that people are going to rideshare, but the bottom line is that we are not a better breed of people than they are in New York. And if you look at New York, they've got a better transit system than we will ever expect, than we could ever dream of having out here, and, still, there is gridlock out there; there are still people driving into town. And there is no reason to assume that that is not going to happen out here. **E.1.4**

The EIR says that congestion effects will encourage more carpooling, but it doesn't tell what these congestion effects really are. What does it mean just to talk about excessive demand and temporary flow interruptions? We should stop fooling around, quantify the problems in a way people can understand. What will freeway speeds be? How will commute times increase? How far will traffic back up at toll plazas, on the freeways, on the streets? How long will the congestion period be in the year 2000? How long is it now? What about in 1981? **E.1.4 E.1.4.2 E.3**

We all know that things are getting worse. There is already a half-hour delay on the Bay Bridge toll plaza at 6:30 in the morning. Traffic crawls on Interstate 80 from 4:00 to 6:30 right now. The EIR doesn't tell you this and it doesn't tell you how it's going to get worse. **E.1.4.2 E.3.1**

Take the example of parking. Even with all these optimistic assumptions that are made in the EIR, there is still going to be a 6,000-space parking deficit according to the EIR. Now, that is not even including any non-C-3 growth. What's 6,000 spaces mean in a practical sense? Who knows? It's a number. The EIR should tell you that that is equivalent to a string of cars bumper-to-bumber lined up from here to San Leandro. People have to understand what these things mean. **E.4.1**

We want an analysis that conveys the real impacts to the readers. We'd like, and CEQA requires, an analysis of the regional impacts -- a.m. and p.m. backups on all the transportation corridors, delays at toll plazas, increases in commute times. **E.1.3 E.1.4.2**

We want the EIR to compare the present situation to 1990 and the year 2000 with regional growth and no San Francisco growth -- that should be the baseline -- tell us what's going to happen then, and then show what happens when we tack on the San Francisco growth there. That is the only real way to do a decent cumulative analysis. **D.3.2.4 E.2.1.3 Q.1**

We'd like the analysis to justify assumptions that are made that more people are going to carpool and switch to transit. Use data from what's happened in L.A. We think that the results are very, very sensitive to the mode shifting assumptions that are made here, and so the analysis better justify them very, very clearly. **E.1.4**

And we ask for an analysis, finally, that is based on realistic and not optimistic assumptions. Really, the EIR should be a worst case analysis, not a best case, let's-keep-our-fingers-crossed analysis. Worst case. If PG&E designed Diabo Canyon using this kind of best case, let's-hope-for-the-best analysis, that nuclear reactor would be in a building made out of cardboard instead of 20 feet of concrete. So we ask for these changes in the analysis. **B.1 D.2 E.1 R**

Transit. The analysis is just superficial. The transit impacts should be analyzed using the correct baseline scenario. For each agency, we should ask: What will the future level of service be without any more San Francisco growth? What's left after that? What's left after that is the possible spare capacity to accommodate the downtown expansion plan. **E.2.1.3**

The EIR should explicitly state in a table, on a page, all the transit agencies' long-term plans. What are the projected capacity increases? How much of those are funded? The EIR should take some pessimistic cases and not just optimistic cases. What are the costs associated with each agency's capacity increases? At a bare minimum, we can calculate that by estimating the cost of an additional peak period Muni run or AC

Transit run or BART run, and multiplying that by the number of passengers that would fit into a bus or a car, and then we would get a lower limit on the additional cost to each transit agency. **E.2.1 E.2.1.2**

On the jobs issue, we have asked before and we will ask again for an analysis of the skills and job needs of present and future San Francisco residents. That has to be quantified, because unless that is done, there is no way to show the positive or the negative impacts of all the alternatives on the City's unemployed. There is not going to be any way to put together a plan or a mitigation measure which will create the right kind of opportunities for unemployed residents. **B.5.2**

Regarding housing. Other people have addressed some of these issues. But the overestimate of housing construction in San Francisco also understates the regional transportation impacts that the downtown expansion plan will cause. Non-C-3 growth should be included in the analysis. Housing shortfalls should be shown for each alternative. Rental housing issues should be addressed. And the shortfall in rental units should be quantified. **A.2 D.2.2 D.2.5 D.3.1 D.3.2.3 D.3.2.4 D.3.3.5 D.3.3.6 E.1.5 D.3.3.2 D.4**

Lastly, regarding mitigation measures. We think that most of the mitigation measures proposed here are either nonsubstantive, they're unfunded, or are beyond the jurisdiction of the Planning Commission. So therefore, they're either phony, nonexistant or meaningless as mitigation. We'd like to see some real mitigation measures addressed, first of all for regional transit. And I'd like to say, some of these people here that came to talk about the regional issues, seems like there are a lot of pissed-off people in the East Bay, South Bay and North Bay, because they're starting to see the direct connection between what happens here in San Francisco and regional problems. And from what I have heard, there may be a lot of them outside the Convention Center when the Democrats are here, asking the question: Who's Dianne Feinstein and why is she trying to wreck the Bay Area? **E.6 P**

As for regional transit mitigation, we'd like to see a Downtown Development Fee to pay for the additional costs incurred by all regional transit agencies to serve downtown expansion. The fee would be collected by San Francisco and distributed by MTC to the regional carriers. We'd like to see Downtown Development District enacted to pay for projects that are clearly necessitated by downtown expansion. For example, the Metro turnaround, the Southern Pacific Extension -- those would have to be built for one reason alone, to facilitate downtown expansion. And downtown should pay for that. The Downtown Plan approval should be made contingent upon establishment of such a district by the downtown property owners, just the same way the downtown paid for the Embarcadero BART station. **E.2.7.2 E.2.7.3**

And we'd like to see a commitment to ensure that the existing Transit Development Fee for Muni covers the full costs imposed on the Muni. The Touche Ross Study is not mentioned here at all. It's 9.82 per square foot is what they say the cost to Muni is. We are charging $5 a square foot. **E.2.7.2**

Housing mitigation. We'd like to see for housing mitigation that you examine lower base floor area ratios, and then give discretionary floor area ratio bonuses to encourage rental housing development. This is all you can build. If you build rental housing, now you can have a higher floor area ratio. **D.5.4**

We'd like to see you do some zoning, the western part of South of Market, from C-3 to RC. And that is outlined in SPUR's South of Market Plan. Right now you are looking at rezoning that portion under the Downtown Plan, and you say, "Well, we'll look at RC zoning later." Now is the time to do it. **A.1 A.4 B.4.2**

For jobs mitigation, we'd like to see a job training program to which developers must contribute. Or you could lower the base FAR's and give discretionary FAR bonuses to encourage the establishment of job training programs. **B.5.5**

We'd like to see small business retention and industrial retention, again, lower FAR's to encourage preservation of older, lower cost office space, which small businesses find most suitable. **B.4.1**

For historic preservation -- once more, lower base floor area ratios will help preserve historic structures. **C.1**

And lastly, we'd like to see an honest assessment of the annual limit on office development. The analysis should be directed at ways to make that annual limit work rather than the biased discussions we see in the EIR. Because the annual limit, when you come right down to it, it's the only effective, sure-fire, guaranteed way to reduce the transit, transportation, housing, small business, and blue collar job impacts. **E.6.1 P.1**

As deficient as the Downtown Expansion Plan EIR is at this stage, it does document serious problems for the City and for the Bay Area. The Downtown Expansion Plan does nothing to control growth and its impacts. It hides them a bit -- prettier buildings, tidbits of open space, historic preservation. But that's all cosmetics. Because what you have here really is downtown San Francisco is like a cancer patient. It's got terminal cancer. The cancer is growing, it's spreading through the rest of the Bay Area. And instead of drastic surgery to cut out that cancer, to deal with the problem, the Downtown Plan proposes just a nose job, a facelift. And we deserve a lot better than that. **A.1 Z.1**

If you really believe that the EIR is correct, if you really believe that in the next three to four years you will only be approving 660,000 square feet of office space, if you really believe that during the 1990's you're only going to approve 840,000 square feet per year, then we challenge you to put your money down on the table. If you believe that that is true in the EIR, then establish an 800,000 foot per year limit on growth. Show us your faith in the analysis of this Downtown Expansion Plan by establishing that annual limit. That way you'll also guarantee that the impacts will be no worse than what the EIR says. **E.6.1 P.1**

Thank you for your time.

[Applause]

PRESIDENT ROSENBLATT: The next speaker is Grant Dehart, to be followed by John Gross.

MR. DEHART: I'm Grant Dehart with the Foundation for San Francisco's Architectural Heritage. Z.1

We are generally in support of parts of the EIR that we have evaluated, particularly those bearing on the preservation of existing architecture in the downtown. We are especially appreciative of the economic analysis and the development scenarios related to the transferable development rights. Z.1

I'd also like to, in the process, commend the consultants and the staff for both a detailed, and as well, a readable analysis. And I can appreciate how difficult and complex this task was. Twelve years ago, I was the Project Director for the Environmental Review Reports for the Washington, D.C. Metro System. Z.1

I will summarize the DEIR lessons and problems identified for preservation, the limits of the analysis that we see, and indicate what we believe is needed in the plan ordinance and in the ordinance as a result of the DEIR findings, and then I will submit detailed comments later. Z.1

What are the lessons of the DEIR analysis for preservation? Only one-third of all significant and contributory buildings are included in the Plan, 485 structures compared to over 1400 identified by Heritage in the Splendid Survivors Survey. There will be no reduction in the rate of building demolition, only a shift from the most significant structures to the contributory structures and to the urban historic fabric of the downtown. C.1.1

I would like to quote a comment on Page 67 that summarizes very well the primary concern and finding that we believe needs to be addressed, and that is, and I quote, "The comparisons of supply and demand for TDR indicate that overall demand alone is unlikely to be strong enough relative to the supply to create strong incentives for preserving the contributory buildings, the retention of which is not required," unquote. C.1.1

Depending upon which of the several conflicting estimates are used, about one-fourth of the Department's list of contributory buildings will be demolished by year 2000. Therefore, the EIR documents -- the objectives and policies of the Plan cannot be implemented effectively by the draft ordinance or the other implementing actions. And these objectives, and I will also quote the Plan itself on Page 65, "Past development, as represented by both the significant buildings and by areas of established character, must be preserved. The value of these buildings in areas become increasingly apparent as more and more older buildings are lost," unquote. C.1.1

On Page 74, dealing with the conservation districts, quote, "Buildings of somewhat lesser quality than those required to be retained take on an increased importance. These buildings help create the setting that reinforces and complements the qualities of the more significant areas, and their own attributes are more apparent and appreciated," unquote. Z.1

There are several problems with the proposed preservation policies that have been highlighted in the EIR. The supply of TDR from Subareas 1, 6 and 2 are too large to be absorbed within each subarea and the Special Development District. Therefore, the price for TDR in Subareas 1 and 6 is likely to be too low to cause preservation. C.1.1

The sellers of TDR's from other Subareas -- C-3-G and C-3-S -- will have an unfair windfall by being able to sell in Special Development Districts. The contributory buildings are unlikely to be preserved by the TDR incentives unless the existing structure occupies most of the available TDR, or FAR available on the site. C.1.1 C.1.2

This is also in the face of severe limits in the analysis that was conducted to reach these findings. We believe that the method of analysis and the assumptions used lead to a serious underestimate of the number of contributory buildings that will be demolished. C.1.2

These problems include, first of all, that the assumptions are not identified or explained in the EIR. The opportunity sites were identified by the Department staff rather than through a rigorous analytical process. The judgments used in identifying these opportunity sites have not been explained. C.1.2

The sites with buildings occupying two-thirds or more of their available FAR were not expected to be developed. This is clearly contrary to our experience, where most of the major preservation problems that have surfaced in this City have been on just such sites -- such as the City of Paris, the Fitzhugh Building, and the California Pacific Building, all of which occupied more than two-thirds of their available FAR. C.1.2

Sites less than 10,000 square feet would not be developed unless aggregated with other sites. This also is clearly not correct, given the specific examples that have taken place in just the last year: The Washington/Battery Street Building with the clock face, 4,650 square feet; 466 Bush Street, 5,675 square feet; the new office that was recently proposed next to the Notre Dame Church on Bush Street, 1911 square feet for the site, and they proposed a multi-story high-rise. C.1.2

The contributory buildings in conservation districts with low height limits would not redevelop the sites. This is also not indicative of what would actually happen. Just on Front Street alone, with a very low 75-foot height limit, if you look at those buildings, almost all of them, a hundred percent of them, could double their available floor area within the 75-foot height limit allowed. C.1.2

There is also the assumption that the supply of new space will only keep pace with the market trends and demand for office space. And it's my observation, although it certainly is not a trained economist's point of view, that supply is as much a function of interest rates availability, national patterns of shifting development, local regulations, and the number of entrepreneurs looking for deals to make in the community. And San Francisco certainly has its share of deal-makers. C.1.1

I have prepared a slide presentation of about 30 contributory buildings that are representative of all of the threatened buildings on the list, and I will hold this for the ordinance hearing, but would certainly welcome the informal opportunity of showing these representative samples to the staff or to the Commission at some other time. This would provide a visual sense of the specific contributory buildings threatened by the Plan's policy to allow demolition as a matter of right for these structures. Most of them occupy less than two-thirds of the available TDR, most are in Subareas 1 and 6, where the value of the TDR may not be as great as the site development, and most are lower than the height limits would otherwise permit. **Z.1**

In summary, I would have to ask the rhetorical question: Is the glass of preservation that is offered by the Downtown Plan half empty or half full? Only one-third of Heritage-rated buildings are included in the Plan. Only 19 percent, or one-fifth, of Heritage-rated buildings are required to be preserved. Nearly 20 percent of the Plan's listed buildings, all of the four categories, are predicted to be demolished by 2000, by the EIR. This is probably underestimated. It represents more than a third of all of the contributory buildings. **C.1.1**

In spite of this, we believe that the Downtown Plan represents a major step forward in the preservation of downtown San Francisco's architectural heritage. But the DEIR clearly demonstrates that improvements are needed. And what is needed? I believe that various subalternatives should be included in the DEIR, and these should be adopted by the Commission as changes to the Plan and the proposed ordinance. C.2

First, the Planning Commission should retain Conditional Use authority to approve or deny demolition of contributory buildings -- Categories 3 and 4 -- on a case-by-case basis. This does not mean that we recommend that all of these buildings should be preserved. C.2.2

Two. TDR transfers should be limited to within the same zoning district, except for transfers from C-3-0 and C-3-R, which should be permitted to C-3-0 SD, Special Development District. That is, transfers from the C-3-G and the C-3-S, which are now permitted by the Plan, should not be permitted beyond the boundaries of those subdistricts, or to SD. This change would help prevent the market for TDR's from being flooded because of their being able to be used in the SD in computation from those from C-3-0 and C-3-R. C.2.1

H.4.2 Furthermore, the gross floor area of existing significant and contributory buildings in the C-3-R and C-3-O Districts should be calculated in the same manner as buildings under the Code Sections 102.8 and 102.10 through 15 for TDR purposes -- that is, for example, additional FAR should be transferable from these sites if the ground floor areas are devoted to convenience retail, not just using this rule for new structures. H.4.2

This, by the way, would give a slight multiplier effect or benefit to those buildings that are transfering from those TDR's where they're competing for the value of the very highest priced land in San Francisco so that they could have an edge over transfers from other subdistricts. H.4.2

Fourth, the base allowable FAR in the C-3-G and C-3-S Districts should be reduced by the same general proportion as that based, as base FAR's in the C-3-O and C-3-R have already been reduced by the proposed plan -- that is, between 28 and 40 percent. We recommend that the base FAR in the C-3-G should be six-to-one, not eight-to-one. That would represent a 40 percent reduction, the same is being reduced in the C-3-O District, and the base FAR in the C-3-S should be five-to-one rather than six-to-one, which is a 28 percent reduction from the existing, compared -- the same proportion as has been reduced in the C-3-R District. C.2.1 H.4.2

These reductions would substantially reduce the supply of available TDR that could be usable in the SD, or Special Development District, by approximately a million square feet, using just gross proportions. It would also help maintain a reasonable price for the TDR in all subareas, and it would treat all property owners in the downtown zoning districts equally, rather than some being wiped out and others receiving a windfall. **C.2.1**

Without these changes, the architectural and historic qualities of downtown San Francisco could be changed irretrievably by 1990 and 2000. And it is clearly not spelled out adequately in the Downtown EIR what happens after 2000. **C.1.2** **S.2**

One other point I would like to highlight, though, is the discrepancy in the way that the numbers of buildings threatened by the proposed Downtown Plan alternative are explained in the EIR. And I have handed out a table of the different results of different sections of the EIR, apparently written by different people. The existing building -- summaries are: 1420 for those rated by Heritage; 485 in all categories of the Downtown Plan as the base from which the estimates are taken. **C.1.1** **C.1.2** **C.3.1**

The estimates for demolition in the DEIR for the summary are: 84, total of 43 to 1990 and 41 to 2000, in the summary. **C.3.1**

In the Impacts Section, there is a total of 89 buildings of A, B, C Category and only 13 in Categories

1 through 4, compared to the summary. C.3.1

In the evaluation of TDR supply and demand on Page IV.B.72, if you extrapolate from the percentages suggested by those figures, it's about 74 to 107 buildings that are contributory buildings alone -- Categories 3 and 4. Clearly, these figures should be reconciled. We think they are, by and large, underestimated, given the assumptions that I have commented upon. And I believe that it points the direction to the Commission that you must retain discretion over contributory building demolitions, and you must reduce the floor area base in the C-3-G and C-3-S so the system will work. C.1.2 H.4.2

Thank you.

PRESIDENT ROSENBLATT: John Gross? Gordon Chin, to be followed by Bill Kostura.

MR. CHIN: Commissioners, my name is Gordon Chin. I represent the Chinatown Neighborhood Improvement Resource Center. Z.1

I think a number of previous speakers have noted that the Downtown Plan is notable not only for what is included but for what is excluded. Mr. Wada made reference to the fact that economic diversity is a concept that has been excluded in the Downtown Plan. Similar references to the Mission Bay Project, being excluded. **E.1.9 Z.1**

I would like to add to the exclusions, Chinatown as a neighborhood. I also, like many other speakers, tried to read the voluminous document, the Downtown EIR and the Downtown Plan. And it was very easy for me to figure out how many passengers and how much treatment the Chinatown area was given in the Plan. I think it's also important to point out that the Downtown Plan cannot be looked upon in a vacuum, separate from its treatment and its impact on the Chinatown area. **B.2.1 B.2.2 B.4 D.3.1 E.2.2.3 E.3.2 E.4.2 N.2**

The Downtown growth rate, which will cause hardships to many residents of San Francisco, will especially hurt Chinatown's quality of life even more. Increased demands for housing, parking, and open space will be crippling in our particular neighborhood, where the shortage of these necessities in urban life is very well known. **B.1 B.2 B.4 D.3.1 E.2.2.3 E.3.2 E.4.2 N.2 C.2**

It is important to remember that downtown cannot be planned without looking at its impact on nearby and contiguous neighborhoods such as Chinatown. According to the EIR, the Downtown Plan will allow growth to attract over 30,000 new downtown office workers by the year 2000, and an increase of a thousand to 1500 new units which will be necessary each year to house them. The EIR states that, quote, "Housing growth in San Francisco will not increase in proportion to C-3 District job growth." I would like to ask: Where are these people going to live? It is likely that while most of the new office workers and the so-called yuppies will not be moving into the heart of Grant Avenue, it is very likely they will be competing for housing in the extended Chinatown area and lower slopes of Nob Hill, Bush Street Corridor, and in North Beach, particularly competing, indeed, with many families who are trying to move out of Chinatown. **B.4.2 D.3.1**

While the Downtown Plan will increase the demand for housing, the mechanics of increasing the supply of housing as proposed is very vague. Affordabity, unit size, location, and the question of ownership versus rental are not addressed. The EIR says of the Plan, quote, "Could accelerate the spillover of office activities into Chinatown and North Beach," unquote. **B.4 D.4 D.5**

Obviously, we are not talking about vacant land. We are talking about new office growth in and near Chinatown which must inevitably displace small businesses and housing. Additionally, we must remember also that new housing construction to relieve the congestion in Chinatown demands some public policy priority for new, affordable housing development in and nearby the Chinatown core area. **A.3 B.4 D.4 D.5 N.2**

Two examples of such sites which have already been lost are the Savoy Garage sites on Columbus Avenue and the Pacific Montgomery site, both new office construction and both sites which were originally identified in the Chinatown 701 Study in 1972 as Chinatown housing sites. **Z.1**

The EIR is also quite graphic about the need for new transit facilities to bring new office workers to and from their jobs. But the mechanisms to finance and implement the necessary transit improvements, estimated to cost over billions of dollars, is not stated. I have to ask what impact this treatment growth in demand for transit will have on existing public transit lines in Chinatown -- the 30 Stockton, the 15 Kearny, and the No. 1 California. Will it be possible for residents in Chinatown to get on a No. 1 California bus on Sacramento and Grant Avenue during rush hour in the future? Will it even be possible to walk on Chinatown streets? **E.2.1 E.2.2.3 E.4.1 E.5 E.6**

The EIR, in assuming optimistic transit growth and that 3,000 city residents will give up driving to work projects a 6,000-space parking deficit. And I would like to know where those cars will park. **E.4.1 E.4.2**

Portsmouth Square is an oasis for Chinatown residents. A recent study showed over 16,000 people enjoyed that very small piece of open space daily. I would like to know what Portsmouth Square is going to look like with 250-foot tall buildings within a block of Portsmouth Square. **A.3 H.3.1**

The Planning Department is now embarking on a new plan for the Chinatown area. Certain development options for Chinatown may even be perhaps precluded by a shadow gridlock-packed neighborhood created by the Downtown Plan. It is vitally important that interim controls be instituted in the Chinatown area to protect us from the spillover growth from downtown. **A.3 E.3.2 N.2 Y.2**

In conclusion, we would just like to urge this Commission to remember that the downtown community, if you will, cannot be planned without assessing fully the total and cumulative impact on the Chinatown neighborhood, and the Downtown Plan should not go forward without a serious commitment by the Planning Department to conclude and seriously recommend future comprehensive plans for Chinatown. Thank you. **A.3 B.2 N.2**

PRESIDENT ROSENBLATT: Bill Kostura, and then Esther Marks, and then Alan Raznick.

MR. KOSTURA: My name is Bill Kostura. As many of you have noted, the Downtown Plan allows growth that will greatly increase transit demands, and the Draft EIR seems to accept this growth based on a growth in transit capacity that will almost certainly not happen. I believe the entire transit section of the EIR needs to be reevaluated based on a realistic look at the amount of increased transit capacity that will truly occur. **E.2.1 E.2.7**

To quote from the EIR on Page Roman numeral IV.E.24, the EIR states, "Capacity improvements proposed in the current cycle (1983 to 1988) of Five-Year Plans have been assumed to be in place by 1990. Additional capacity increases have been assumed to be in place by the year 2000." **Z.1 E.2.1**

Yet on Page J.25 to 26 of Volume II, the EIR contradicts this by admitting, "These increased capacities will almost certainly not be attained." **E.2.1**

To quote from the Appendix, "For 1990, Muni capacities are assumed to increase on the basis of line-by-line improvements shown on the 1983 to 1988 short-range Transit Plan. Capacity increases are not solely a function of planned vehicle acquisitions, however. In order to expand service, it is necessary to fund both capital and operating expenditures. Expansion of current service requires additional funds that have not been appropriated for drivers, mechanics, and other support staff. It appears likely that capital projects would be fully funded, whereas funding for operational expenditures would be uncertain in the future. Subsidies from Federal sources for operational expenditures have been declining in recent years and are expected to be discontinued by 1989. The formula disbursements from State sources are not expected to grow sufficiently to meet the loss of Federal funds. Local subsidies require annual appropriations and thus are subject to competition from other locally-funded programs." **E.2.1 E.2.7**

Thus, the increases in transit capacity that are assumed to take place in Volume I of the EIR are highly questionable, whether they will take place, according to Volume II of that same EIR. **E.2.1**

This contradiction must be resolved in the Final EIR. In fact, the impacts of the Downtown Plan on local transit systems and the effect if capacity is not increased must be analyzed in the Final EIR. **E.1 E.2.1.3**

I believe future high-rise development must not be allowed until it is shown that increased transit capacity is definitely obtainable, i.e., the money for transit improvement is in hand. Even current conditions are intolerable. As a taxi driver, I can tell you that when I leave the taxi yard at 5:00 p.m.

at South of Market, I avoid the core downtown area, where the demand for my service is greatest, because of current gridlock traffic conditions which prevent my getting to patrons. I can tell you that most other taxi drivers do the same. Right outside the taxi yard, there exists gridlock conditons on streets South of Market feeding into freeways. There is gridlock right now. I have stood near some of these onramps and watched traffic light after traffic light change with no movement in traffic. **E.2.1.2 E.3.2**

As far as transit goes, recently I did my own informal Muni Metro traffic count at Van Ness Station during p.m. rush. So here is an example of a detailed traffic count that you don't see in the EIR. From 4:30 to 5:45 p.m., 58 LRV cars passed outbound through Van Ness Station. On the average, there were 50 standees per car. And 31 of these cars, or 53 percent, had over 60 standees per car, near crush loads. **E.2.2**

At the worse point, consecutive N Judah cars had about 60, 70, 75, 70, 80 and 90 standees per car. I would have thought these figures impossible before I attempted the counts themselves. These figures are possible only because of the fairly wide amount of standing space in the middle of the car and at the doors and if you crush these people like sardines. **E.2.2**

Does the EIR consider whether these day in and day out conditions are acceptable or should be eased? There is no discussion of this. It does promise that transit demands and the traffic crush will increase very significantly, and that the traffic capacity increases, which are assumed in Volume I, are not likely to happen, as I quoted from the appendices in Volume II. **E.1.3 E.2.1 E.2.2.1**

I suggest, why not an alternative Downtown Plan which allows no new high-rises until existing conditions, which are intolerable, are softened and until all new strains in the City caused by future development are mitigated -- not only in traffic and in transit, but in housing, blue collar jobs, and some of the other factors that have been talked about today. **B.4.1 B.5.1 B.5.5 P.2**

Thank you.

PRESIDENT ROSENBLATT: Next?

MS. NURRE: Esther Marks has kindly traded her time with me. Mr. President and members of the Commission, my name is Jane Nurre. I am speaking as an individual today. **Z.1**

I reject the goal of the Downtown Plan, that San Francisco should be a financial center and therefore awash with high-rise development. There exists no evidence that this goal is a benefit to the residents of San Francisco. The primary goal of the residents of San Francisco is that the City -- the whole City -- should be a liveable city. **A.1**

The goal of a financial center saturated with high-rise building is a goal of wealth, made official by a pliant and unaccountable bureaucracy. This proposal, if accepted, will bring more commuters, more packed-full buses, more shadowed and wind tunnel-like streets, more gridlocked intersections, more air pollution, the loss of affordable housing and a destruction of local businesses and jobs. This is not what we want. **A.1 Z.1**

Clearly, this proposal is an environmental deficit for us all now and for all future residents of this City. **A.1**

Thank you.

[Applause]

MR. RAZNICK: I'm Alan Raznick, President of the Coalition for San Francisco Neighborhoods. I'll present today an overview of our position on the Downtown Plan and Draft EIR. Our statements on housing, on transportation and on TDR open space are not ready today. We hope to be able to give those at another session of the Commission. We do appreciate, incidentally, the extension of 30 days for written comments. We hope there is another session to present oral testimony. **S.1.3**

Our presentation is critical of the Downtown Plan and its EIR. This is because the documents, in our view, skirt the major issues. Although understated, they describe the immediacy of downtown commercial growth. However, they only give us the hope for sufficient housing and transit capacity. Such an equation is not acceptable. Yet despite our opposition, we feel that the process of bringing these issues before the public is a constructive one, with changes that meaningfully address the issues we raise, and we hope that we could endorse the Plan at some point. **A.1 B.4.2 D.3.1 D.5 E.2 E.6 S.1**

The coalition's desire for San Francisco of the year 2000 is a vital city with the kind of economic and social diversity that has been its hallmark. We envision a city that is still hospitable to families and offers employment opportunities in maritime, in light industry, and has a significant social service sector. We envision a city that has made significant progress in solving its housing and transportation problems despite continued growth. **A.1 Z.1**

To achieve this vision is to reject some of the underlying assumptions implicit in the Downtown

Plan and Draft EIR. Most significantly, we do not believe we have an obligation to receive whatever commercial growth is imposed by the private sector. **A.1 Z.1**

In addition, we believe that the residents of this City have an inherent right to liveability, and that this right is more significant than the developer's rights to profit. **A.1 Z.1**

The next 16 years of downtown commercial growth present a threat to the City unparalleled since the freeway development crisis of the 1960's. The residents rose up to stop the insanity of freeways through Golden Gate Park and many of their neighborhoods. The environmental impacts of the Downtown Plan as it is presently conceived constitutes just as serious a threat and must be similarly rejected. **A.1 Z.1**

The Draft EIR concedes severe adverse environmental consequences from projected downtown development. However, the situation appears to us to be much more alarming. We believe that the downtown growth rate is understated and that the likelihood of sufficient housing and transit accommodations is overstated. For example, the Plan assumes an annual growth rate within C-3 of 1.5 million square feet for the next -- this is annual -- for the next six years, reducing to a rate of about 840,000 square feet a year for the following decade, an average of about 1.1 million square feet for the next 16 years. B.1.1 B.1.2 D.3.1 D.3.3.3 E.2.1 E.2.1.2

How comfortable is such a projection, for it suggests a decrease in the rate of growth? We believe that these projections significantly understate the commitments made by the Commission and, even more particularly, the potential number of project applications currently under review by the Department. B.1.1 B.1.2

The Draft EIR's projections assume a substantial, almost immediate, falloff in applications once the Plan is adopted. We believe that such a statement in the Draft EIR is based on wishful thinking, and request that the documentation for projected growth, both within and outside the C-3 District, be updated to 1984 and furnished the public. B.1.1 B.1.2 B.2

Because of these uncertainties, we don't believe it's fair to ask the public to place reliance on the assumptions that somehow sufficient housing and transit will materialize. In your future deliberations, Commissioners, you should be considering housing and transit commitments, not hopeful plans -- particularly where the lead times in building transit capacity are as long or longer than for building downtown office buildings. I repeat -- the certainty of downtown growth, balanced against the hope of sufficient housing and transit, is not an acceptable equation to our membership. **D.2.2 D.3.1 D.3.2 E.2 E.6 P.2**

Consequently, I wish to propose a mitigation measure designed to respond to the uncertainty of whether sufficient housing and transit capacity will materialize. I propose that the rate of commercial development in the greater downtown area -- not just within C-3 -- be linked to increases in housing and transit capacity. Provisions to achieve and enforce this mitigation measure should be added to the proposed legislation implementing the Downtown Plan. It is practical to do this. Methodology exists. **E.6 P.2**

Our proposal would involve the establishment of a schedule of downtown growth which would be tied to a schedule of housing development and transit development over the next 16 years. Each year, each of these schedules would be updated based on the latest data and the rate of growth during the preceding year. If the projected rate of housing or transit development fails to be met, the rate of commercial office development in the greater downtown area would be proportionally reduced. **P.2**

The need for this mitigation is recognized in the Draft EIR, where at Page 5.E.1 it states, and I quote, " . . . if the Plan, or proposals similar in nature or intent, are not followed, the growth rate may need to be slowed as a matter of deliberate public policy," end quote. **P.2**

We urge that this concept be taken to its logical conclusion, that if the housing and transportation measures on which the Downtown Plan is predicated are not followed, the growth rate must be slowed, as there is no assurance that sufficient housing or transit capacity will materialize. Even in the short run, we ask for these measures now, particularly since the bulk of the proposed downtown growth will occur during the next few years. Waiting five years will be too late. **P.2**

This suggested approach is preferable to fixed annual limits, for it allows expanded commercial development -- if sufficient supporting infrastructure and adequate mitigation measures are implemented. This approach would restrict such development and minimize the resulting adverse impacts on our residents. **P.2**

Such an approach has the further advantage of securing the political commitment of the development community to securing sufficient housing and transit capacity. Their self-interested support could be a powerful force in making sure that the necessary mitigation measures are realized. P.2.4

We fear that any any other approach, save low annual fixed limits, spells disaster for residents of what is a wonderful city, a wonderful place to live. Please help us keep it that way. P.1 P.2

PRESIDENT ROSENBLATT: Alan, do you have an extra copy of that?

MR. RAZNICK: Not an entirely legible one. I will supply one.

PRESIDENT ROSENBLATT: Would you, as quickly as you can?

MR. RAZNICK: Yes.

PRESIDENT ROSENBLATT: We will take a short recess for the court reporter. The next speaker, when we start again, will be Brad Paul, and then Linda Chapman.

[Short recess]

PRESIDENT ROSENBLATT: Ladies and gentlemen, can we reconvene, please.

All right. The next speaker is Brad Paul.

MR. PAUL: Mr. President and members of the Commission, my name is Brad Paul, and I am speaking for the North of Market Planning Coalition. The Coalition will be submitting written comments in the next few days or next few weeks, and we are going to be speaking this afternoon mostly about the impacts on the Tenderloin and the aspects of the downtown EIR that affect the Tenderloin. **B.4.2 Z.1**

But I would like to say that I think the major shortcoming of this document, both practically and legally speaking, is the lack of a broader vision in the discussion of the City beyond the C-3 District, particularly in the case of Mission Bay, and also, as you have heard from previous speakers, on a regional analysis of the impact of downtown development.

B.2.1 B.2.2 D.3.1 D.3.2.3 E.1.5 E.1.9 N.3

And I'd like to give one example of that. We have a member named Janis, who was a member up till about a year ago, a physically disabled person on SSI. Her rent at different hotels in the Tenderloin went from about $100 a month to $260 a month. At that point, she moved to a residential hotel in Oakland, where she got, again, that room for about $140 a month. **Z.1**

But I think that says something that is not addressed in the EIR, and that is that our poorest residents that are forced out and displaced through gentrification end up moving to places like Oakland, Berkeley, Richmond and the East Bay because there are slightly cheaper rents there. **B.4.2**

So, for people that were speaking earlier from the East Bay, our development contains sort of a double whammy -- the office workers that move to the area to take these jobs and who don't live in San Francisco, who live in the East Bay, are competing with the existing neighborhood residents for housing. **D.3.2.3**

And then the office workers that end up living here and competing with existing residents and displacing them, the displaced residents can end up moving to the East Bay and competing with local residents for housing. So they get it both ways. **D.3.2.3**

I'd like to focus mostly right now on the Tenderloin and Section IV.B.52 -- again, an interesting number for that section -- is on existing housing, Section IV.52. And the section I am referring to says that, "The forecasts of C-3 District housing in 2000 assumes that there are no changes in the 1990 housing stock. For residential hotels, it is assumed that the Residence Hotel Conversion and Demolition Ordinance would continue to protect the existing residential hotel units in the C-3 District." **B.4.2**

Well, I have some sad news. I wish I could say it was the hotel ordinance that protects units right now, residential hotel units. But, really, it's the slump in tourism that has saved most the units -- because of three major loopholes in that ordinance.

One is: Who has standing to challenge a conversion. The second is the summer/winter clause, which allows owners to convert any residential unit to tourist use for five months of the year, what's called "summer." And the third loophole is the 40 percent buyout. You can buy your way out of units that are classified in the Unit Usage Report as residential by paying 40 percent of the replacement cost. Now, originally it was thought that the City in Section VIII could make up the other 60 percent. But Section VIII in the Federal subsidies are gone. **B.4.2**

In Chinatown -- and this is part of what you heard in the discussion of the Chinatown moratorium on hotel conversions -- there are developers willing to pay the 40 percent buyout. I am afraid we are beginning to see on the Bush Street corridor and along Geary, if you've been reading, particularly in Herb Caen's column recently, all the talk of converting old residential hotels to high tech bed-and-breakfast. We are going to see the same problem soon in the Tenderloin. **B.4.2**

But, again, let me give you just one example to illustrate this. There was a hotel across the street from the Cadillac called the P and W, which until a few years ago was 35 residential units.

Several years ago, the owner hired some managers to clear the building. And this meant basic strong-arming and threatening of tenants. A handful resisted. They were paid a little bit of money, several hundred dollars, to move. And the owner had a vacant building, then turned around and leased it six months later to an operator who operates it now as the St. George Hotel for mostly Western European students traveling in the United States. **B.4.2**

The Unit Usage Report on that hotel says that it's a hundred percent residential. It is in fact a hundred percent tourist. Now, what can somebody do about that? Our so-called conversion ordinance says that you have to be a current resident to challenge, or you can be an organization like ours . . . if you can find three or more tenants who have lived in that building not more than 90 days ago. But if you haven't rented to permanent residents for more than 90 days, that's impossible. **B.4.2**

Recently, however, there was one person who had been there about 35 days, went to the Tenderloin Housing Clinic and tried to challenge, and BBI ended up ruling after the hearing that they could only prove he had been there 24 days, so they couldn't sustain the challenge. When we questioned people from BBI about that, their response was: Well, this guy will get the message eventually if we keep on his case that he has a problem. And my response to that, quite frankly, was to just "give me a break." This guy has just learned a very simple lesson. If he doesn't rent to anybody for more than 31 days, there will never be anybody with the standing to challenge his conversion, and he will be able to break the law from now to the year 2000. And those 35 units, which say on his little slip of paper in the lobby, "residential," will remain tourist. That is the primary problem. **B.4.2**

Now, I've got something here that I would like to pass out quickly to members of Commission. This is a flier -- just so you know we haven't been asleep on this issue. This is a flier we passed out to our members. We have been attempting, along with groups in Chinatown and the Inner Mission and South of Market to amend the ordinance so that it is enforceable. And if you look at the date on this, this is to come to the Board of Supervisors for a hearing on amendments to strengthen the Hotel Conversion Ordinance. The date on this is Monday, July 26, 1982. **B.4.2**

I won't mention any names, but a certain person in the City Attorney's Office who you no longer have to deal with, but you used to, bottled this thing up for two and a half years under the pretext of, because the law was being challenged, we couldn't do anything to change it, even if we did environmental review. **B.4.2**

Well, she is no longer there. But the ordinance is still over in the City -- the amendments are still over in the City Attorney's office. You'll be hearing them soon, and I hope you'll act on them quickly. Because, really, it's luck that's preventing a lot of the conversions. With the Democratic Convention coming up and the possiblity that tourism may pick up, we would lose a lot more units. But it's not the hotel conversion ordinance that's stopping the conversions from happening. And I think we either have to deal with that quickly or really change that part of the Downtown Plan EIR that states that, because it's just not true. **B.4.2**

The next section I'd like to look at is on the next page, where it says, "The Downtown Plan proposes that several areas within the current C-3 District with large amounts of housing be removed from the C-3 District zoning." And they specifically mention zoning for this housing will be changed in a North of Market Mixed Use District. I won't repeat any of the testimony that you heard last week about our problems with the density increases in a Mixed Use District, but I think we have to look at that -- and we will be presenting you with some of the transcript from that hearing as part of our written comments -- when you try to look at ways to protect that housing and how complicated it is. I don't think the Draft Environmental Impact Report really speaks to that sufficiently. **B.4.2 Y.2**

The third point in this section is that for housing remaining under C-3 District zoning, about 55 percent of the 1990 housing space, the forecast assumes that the Plan's policies would protect existing housing. **B.4.2**

Now, in this area, again, I'd like to use a specific example to show that the protections, even if enacted, are only as good as the enforcement mechanisms. Last week you heard the North Beach rezoning to protect housing above the first floor. And as many of you remember, when we were here for the 1000 Montgomery hearings, I presented a survey of the housing that could be lost south of Broadway. And at that time, you incorporated in the RC-4 area things between Broadway and Pacific and roughly Battery and Powell Street, about 400 units. **B.4.2**

I, two and a half years ago, had to leave where I lived, at 41 Osgood, because the owner said he had to do substantial rehab to bring it up to code as residential. I visited my old apartment four weeks ago, and what I found was $2.50 a square foot commercial space. This is in total violation of what you intended, and, I believe, the law. **B.4.2**

There was a commercial tenant in that building on the ground floor space who called BBI on numerous occasions to complain. She knew what you had done. She knew they had to go for a conditional use permit to get this kind of conversion. They haven't. And what she was told by one of the inspectors at BBI was that he had seen the plans, they showed kitchens and bathrooms, therefore it was residential. And he didn't come out to do a site visit. Now, she complained. She knew the system, how it works. She called BBI, and that is the satisfaction she got. **B.4.2**

Yesterday I submitted to the Commission and to Bob Passmore a letter detailing this problem and documenting it. Hopefully we'll be able to do something about this one case, but it's taken two people who are fairly knowledgeable about this process to do that, if we do it. How many other units are being converted? This same man who owns my former residence, I understand, just bought a building where

B.4.2

the Phoenix Theater is on Broadway, a vacant apartment building. And I would think, since he has gotten away with it once, he may attempt to do it again. But I think we really have to not assume that because we pass a law, it is going to be enforced and that all those units are going to be protected. **B.4.2**

In Section V.D.2 under "Mitigation," there is a statement, there are two statements, one on that page and the next page, which I think say a lot about what is in the the EIR. And it says, "From the perspective" -- this is under "Effects On The City's Housing Market" -- "From the perspective of the City's housing market, less employment growth would mean less increase in the competition for San Francisco housing." Now, this phrase, which appears again and again, "competition for San Francisco housing," I think is a sanitized way of saying "displacement and gentrification." **D.3.1**

But what I want to focus on is "would mean less increase." The next page, the same phrase comes up, slightly changed. It says, "Less employment growth would mean somewhat less increase in the competition for San Francisco housing." And from then on in, it's not "less," it's "somewhat less." It's even more qualified. **D.3.1**

And I'd like to speak, again, with an example or several examples of why it's important to understand the subtle difference. The rate of growth we are seeing now in San Francisco has a drastic effect on gentrification and displacement. You are familiar with the Ramada Inn. On the block adjacent to the Ramada Inn, there are now three vacant hotels. The Empress and the Mason have been vacant for a while. The Zee, if you were reading the papers two weeks ago, was cleared out by the Health Department. There are in those three buildings a total of 275 vacant rooms. They're all basically operating the same way right now. They're waiting to see what happens in the neighborhood with development. **B.4.2**

Mr. Glimidakis, who owns the Zee, will sell that building for somewhere between two and $6 million, depending on which day you talk to him. He believes, because we are approving the kind of development we are nearby, and that you may approve Union Square West, that it's not worth it to him to keep it up and do the Health Code work that would need to be done to keep it open. He wants to sit on a vacant building and wait for somebody to offer him $3 million. Those three buildings are within a half a block of the Ramada. **B.4.2**

Another block away, you've got, as I

mentioned, P and W, 35 units. Up on Geary, you've got the Paisley Hotel, which is now the Union Square Plaza. What you don't know about that is that 75 of the 90-some rooms are residential in the Unit Usage Report, yet the owners have a policy of conversion to tourist. And, again, it's because of the development going on in the Union Square area. The Somerton, which was in Herb Caen's column several days ago, is owned by something called The Hotel Group. Most of the people who live there are permanent residents, many of them members of our organization. We have a lawsuit going to stop illegal conversion, because we happen to have, in that case, a couple of residents who filed a complaint. **B.4.2**

But, again, the kind of development going on sends certain messages to property owners not to keep their property up, to let it stay vacant, and basically bank it for a few years until a lucrative land use comes up. **B.4.2**

Now, you can try to legislate that, but can you imagine if you and the City propose legislation that forbids an owner to keep a building vacant for more than three months? Can you imagine the fun that Quentin Kopp would have with that when it got to the full board? **B.4.2**

The other alternative, though, is to take away the incentive for that kind of behavior, and that is to not let people think that-whatever somebody in the private sector proposes to be built stands a good chance of being built. And that gets back to my first point about regional impacts, and that is employment development or employment growth. I don't understand, and it's not addressed in this document, why 500,000 square feet -- if we had a 500,000 square foot annual limit, and not everybody could build in San Francisco, I feel is what's really needed -- if you built that 500,000 square foot building in downtown Oakland, what's the problem? For San Franciscans who get jobs in that building, it may mean, instead of commuting on Muni for 45 minutes, if they lived in the Mission they could get on the reverse commute on BART and be to work in 20 minutes. They'd get to work faster. For the East Bay workers, it means not clogging the Transbay Tube on BART, not going on the Bay Bridge, but being closer to work. It reduces the transit impacts. **B.4.2 E.1.4.3 E.2.3 E.3.1 P.1.**

The one area where it might create a problem would be in property taxes. But we happen to believe the 1979 Sedway-Cooke Report that said that even before Prop 13, high-rises did not pay their own way, probably did not pay their own way in terms of cost, revenue, and cost to the City. But definitely after Prop 13, they didn't, and the Sedway-Cooke Report said by probably as much as 25 percent. **Z.3**

So, in closing, I'd like to say that I think -- in our neighborhood we have learned a lot from watching developers. And one of the things developers do is operate regionally. Southern Pacific and Sante Fe is one company; they have a however many million square foot project in Mission Bay, and, as you heard earlier, three or four million square feet proposed in Berkeley. I think the City of San Francisco has to start thinking of urban development and office development in a regional context and look at alternatives that may push some development to Oakland, and question whether or not that is bad for the City. **B.2.1 B.2.2 D.3.2.1 N.3**

The employment growth is there. The opportunities will exist for San Francisco residents on the reverse commute to get there quickly and will still have, at half a million square feet, a lot of development and job or employment growth here in San Francisco. **B.2.2 E.1.4.3**

Thank you.

PRESIDENT ROSENBLATT: Linda Chapman.

MS. CHAPMAN: I am Linda Chapman speaking for Nob Hill Neighbors. First of all, for the record, I want to mention with regard to the opportunity offered for public comment, that while we are pleased to hear that the written comment period has been extended, one of the planners on our board pointed out that the State requirement regarding public comment is based on the assumption that an EIR will generally not exceed 150 pages. And we have an EIR that represents ten times that volume, if you count the 1100 pages in the EIR itself and 400 additional pages in reports that are referenced that people have to run around and look for. **S.1**

So, by parallel, if you consider the size of this report, you would be allowing 300 days for comment, for written comments, and certainly more than one public hearing seems to be justified, if not 300 days for written comments. **S.1.3**

I want to echo, getting into the substance of the EIR, I want to echo Gordon Chin, who pointed out how much impact downtown growth has on nearby residential neighborhoods. And Nob Hill is one of those neighborhoods. I want to address just one effect that downtown growth is having on Nob Hill right now and that we expect is going to be intensified by any future downtown office development. **B.4.2 D.3.1 E.2.2.3 E.3.2 E.4.2**

There is no discussion in the EIR at all of the loss of residential apartments to transient use that we've been able to find. Brad Paul mentioned how inadequately the report addresses the loss of residential hotels to transient use. But there is no discussion of the loss of apartments to timeshares or to short-term rentals, also known as executive suites.

B.4.2

Our apartments, which used to be homes for people in our neighborhood, are now being offered by the day, by the week, or on one-month terms. And they're being advertised either as timeshares or as short-term rentals for business travelers, for the people who come to work in those downtown office buildings that we are encouraging, for people who are going in for a training period or an executive who is coming to be here for a few weeks, as well, of course, as for tourists.

B.4.2

Now, I can't believe that the staff is not aware of this and couldn't have informed the EIR consultants, because we have submitted our little Nob Hill Neighbors' Report on this with maps and colored spots and, you know, reports on particular buildings to you on several occasions in the past, updating it from time to time. Our last update was summer of last year. And we have given this to the staff and we have given it to the Commission repeatedly. In this little report, I am going to quote one ad from the "Wall Street Journal." A building was being advertised for sale on April 22nd last year, and it says, "20 large executive apartment suites with timeshare approval. Bed-and-breakfast hotel use okay." All right. This is 955 Pine. This is an apartment building in our neighborhood. This is zoned residential. It is not zoned hotel. It is possible to have hotels in this area with a Conditional Use. We are not aware that this building ever came before you for Conditional Use hearing and bed-and-breakfast hotel use approval. At least we weren't notified of that. **B.4.2**

Just briefly, the history of this building is that in 1980, there were people living there, and they were notified that they needed to vacate their units temporarily for remodeling, and then they would be able to reoccupy their apartments, which were low rent, for an estimated increase of $60 to $90. That's what the letter said. I told the person who called me, "Don't move. I would be real wary of this because all these short-term conversions are happening all around you." But they moved. And when they came back to get their apartment, they were short-term rentals and they were very expensive. **B.4.2**

In fact, last year, when we checked the prices, they were renting one-bedrooms for $70 to $80 a day. They may be even more now. And, according to the ad, at least, they're supposed to have gone timeshare. We weren't able to locate that timeshare record in the State records. B.4.2

Our report indicates that 19 apartment buildings on Nob Hill, which we have confirmed, have either become short-term rentals or timeshare. And some of these buildings have fully converted. They're all timeshare now or they're all short-term rental. Others have some units that are renting short-term and some that are still occupied by residents. In some cases, all of the tenants were evicted, as in the case of the building I just told you about. In other cases, the process is gradual; people are encouraged to move, the apartments are not rented to residents again. As the people move out, often with a little bit of pushing and prodding, like illegal rent increases, for example, then the apartments begin to rent short-term. And ultimately, in a number of cases, they apply to the State for timeshare approval, and the building is gone for residential use forever. B.4.2

Some of the buildings may remain partially residential over the long haul. In some cases, the buildings appear to be part residential and part short-term. Usually, though, the building eventually winds up completely converted. B.4.2

One of the buildings that is still in process, which you are very familiar with because the tenants have been down here so often, is 899 Pine, 208 apartments. And the process in that building has been underway for five years. And since they couldn't do an official hotel conversion, as you know, each time somebody moves out, that apartment is converted, and they rent now for $3,000, $4,000 a month -- in some cases to Katherine Hepburn when she comes to town to be in a play and to movie companies when they come up from Hollywood. B.4.2

Now, the figures in our study done by Nob Hill Neighbors are very conservative because we are trying to be really careful, so we greatly understate the problem, probably. We know that several hundred units are lost already. By the most conservative guess, it would be 350, and this would assume that in buildings that are only partially converted, where we don't know the exact number, that no more than one or two units had been converted, which is unlikely. B.4.2

If all of the units in these 19 buildings eventually complete the conversion -- if, for example, 899 Pine, which now has less than half residential units, eventually winds up with none, there will be about 770 units of residential apartments lost in these

19 buildings alone. Now, there are other buildings on Nob Hill which we are aware of where the same process is occurring, but we haven't confirmed. 900 Powell, as an example. It was reported in the news that the District Attorney was after the owners for evicting tenants in order to turn them short-term. And we heard that from other tenants as well, but since we haven't had direct contact with the owners or seen the ads, we are not counting buildings like that. And there are others that we are suspicious of and are watching. **B.4.2**

Again, the figures that we mention, from somewhere between 350 and 770 apartments are for Nob Hill only, and only those buildings we're aware of. There are similar arrangements all over the City. On Russian Hill, one of our members checked out the Sangvacomo high-rise on Chestnut. I think it's 1000 Chestnut. And that building has gone the same way. And the same thing has happened in buildings in Pacific Heights. I am sure you are all aware, because some of these have come before you, that small hotels and bed-and-breakfasts are popping up in other neighborhoods all over the City. **B.4.2**

One day when I happened to be down at the counter at Planning, somebody called in, they wanted to convert an apartment building in Arden Danekas' block, the president of the Coalition. Now, this happens to be residentially zoned, and bed-and-breakfasts and hotels are not allowed there. The planner was trying to convince them that they shouldn't just go ahead and do this under the table without a proper procedure and that they were likely to get in trouble. But how many times do you suppose they just go ahead and do it? **B.4.2**

Another board member of ours who worked for Fireman's Fund reported that her company had bought a building, an apartment building in Laurel Heights, and they just used that for their business travelers coming into town now instead of bothering with timeshares or short-term rentals or hotels. **B.4.2**

So, a lot of this is sub-rosa, a lot of it is unknown, and it certainly doesn't appear in your records. **B.4.2**

I would submit -- we would, the Nob Hill Neighbors -- that this has an impact on sensitive receptors, such as elderly people living in our neighborhood. An example would be one of our members, Hazel George. Hazel used to live at 560 Powell, and she was forced to move when it went into short-term rental, later timeshare. This was another case where they were all tricked into moving for remodeling, and then went back and discovered their apartments were now for business executives only. She moved from that building to 602 Mason. What do you suppose is happening there? That building is also going short-term rental. And there are just a very few apartments in that building in which this elderly lady has settled that are still for residents. How much longer she'll be in that building, who can guess? **B.4.2**

So, if you add to the loss of Nob Hill apartments that I have mentioned about another 800 in the neighborhood that have gone for condo conversion, and then the possibility of demolition of apartments to build luxury condo's for downtown executives, which we keep coming in to fight, that is a very substantial portion of the housing in our neighborhood. And I submit that the Department really has no handle on number of apartments that are being lost to short-term rentals, because there is no process for this, there is no approval, there is no permit. **B.4.2**

And as for timeshare, although the State has some records on that, you don't do anything regarding approval, and you have haven't figures in the EIR. So, how many have already been lost? And how many can we project to be lost in the future if downtown growth continues? And with no controls whatever on this kind of process, heaven only knows. And there is no **B.4.2** reasonable basis for you to calculate what the net gain or, in fact, the net loss we can expect in apartments in this City is going to be over the next few years, and thus how we can provide housing for the people who are going to work downtown. B.4.2

PRESIDENT ROSENBLATT: The next speaker is Bette Landis, to be followed by Andrew Butler.

MS. LANDIS: I'm Bette Landis, and I'm speaking for the Open Space Advisory Committee. I am sure all you commissioners are getting ear burn about now. Z.1

One of the things that we are concerned with is -- and the one thing we are assured of with the Downtown Plan is that San Francisco is going to become more dense. And with this increased density, we must protect the public parks that we have and we must protect them from shadowing. H.3.1 Y.1

The Open Space Committee does not agree with the study that was made, the Solar Fan Study. We feel it's far from adequate, that the March 21st to September 21st, and the hours from 10:00 to 4:00 might apply to Iowa City or Cheyenne or Richmond, Virginia -- some place that has four seasons. But San Francisco, as everyone who lives here knows, does not have that kind of climate. And certainly the people in the City do not use their parks in such a limited time span. H.3.1 Y.1

Our worst weather, of course, is in July and August. Those months are included in the Solar Fan Study. Everybody knows that when school adjourns for the year, the fog and the cold weather comes in. We also know that when school vacation is over, the very next day, the fog lifts and it becomes very bright and balmy, and it's that way probably until mid-November. And if the rainy season doesn't come in, we still have a very moderate climate, and people are out using the parks all during that particular time. H.3.1 Y.1

On Christmas, for instance, you can find people in their shirt-sleeves and shorts, running around the City, indulging in softball, riding bicycles, playing on the recreational equipment, et cetera. However, today, if you are outside, you are going to get a chill because it's so cold outside. If you happen to be in a shaded park today, the park user is going to have frostbite because it's so cold. H.3.1 Y.1

So it seems to me that our professional planners are well enough equipped that they can come up with an accurate Solar Fan Study that really applies to San Francisco and the kinds of uses that we have in San Francisco for recreation. H.3.1 Y.1

Everybody knows that the stepsister, try as she may, could never cram her foot into Cinderella's slipper. And San Francisco has that kind of a fragile and unique environment. We don't want us to be subjected to a Solar Fan Study that doesn't apply to San Francisco, because if you cram too hard into that glass slipper, the glass slipper might break. **H.3.1 Y.1**

MR. BUTLER: My name is Andrew Butler, chairman of the San Francisco Tomorrow Open Space Committee. I am going to speak much on the same subject.

The open space policies of the Downtown Plan sound great. They say all the right things, but there is no real mechanism to make it happen the way it states. If you look at downtown as a working environment, there are only three types of open space down there: The existing parks, the squares, the streets and sidewalks, which comprise about 30 percent of the land area, which is quite major, and the snippets and mini-parks and plazas, which are privately owned, relate to the buildings. **A.1 Z.1**

The plan under the EIR does try to deal with the existing parks somewhat, but only minimally. They mainly talk about wind and shadow protection. As Bette has just said, the sunlight protection relies on a solar fan which has been designed around something called, well, designed to protect sunlight only during critical times, which is between the hours of 10:00 a.m. and 4:00 a.m. and between March 21 and September 21. That is only half the year and half the day, essentially. And this City is a city, probably one of the few in the world, where you can actually be out and about all times of the year. **H.3.1 Y.1**

And in the EIR it does say, "Pedestrian areas need sunlight and/or shelter from the wind at all times of the years to be consistently comfortable, except on the warmest days of the year. Because of San Francisco's moderate temperature range, sunny, wind-protected public space is more usable in all seasons than in any other city with more extreme climates." **H.3.1 Z.1**

So, you're saying it here in your own EIR, but at the same time your shadow protection or sun protection is designed for half the day and half the year. So this is clearly designed, really, for the workers of the downtown area. It's not, as is stated in your policy, designed to be all year, all week, for every kind of open space system. The EIR and the Downtown Plan, if they're using solely the solar fan principle, are we talking about open space which is for the workers who are downtown at those limited times and not for the 22,000-odd residents who live in the C-3 District and also the other people who use that area for other purposes besides working? **H.3.1 Y.1**

A majority of the open space in the downtown C-3 District presently, as I said, is in streets and sidewalks. And this is one area which probably where most of the recreation activities take place. The parks do get used heavily, but I think much of the activity and recreation and socializing, particularly at lunchtime, goes on in the street space. **H.3.1**

And there is nothing in the EIR which really deals with the impact of the buildout on the these types of open space. It deals with parks and other open space but doesn't deal with the major open space. **B.6 H.3.1**

I spent lunch hour today on the steps of the old Federal Reserve Bank which, despite the cold wind, was very sunny and pleasant. This is a very good example of what the City Planning Department likes to call snippet. The sun was shining. There was a mariachi band playing. People were eating their lunch and gathering to watch -- all kinds of people, probably about 150. This, to me, is downtown recreation, at least one type of it, and a very important part. It was actually hard to leave that and come down and be at this hearing. But then I realized that this hearing does have an effect on what was going on there, because when I looked at the Downtown Plan, which I was sitting on, it had a map which showed that the corner immediately opposite would allow a 300-foot building, which would affect the use and usefulness of the snippet that I was occupying right then, which tends to have sun from about 11:00 till 3:00 or 4:00 in the afternoon right now. **H.3.1**

If you look at Montgomery Street, which is parallel to Sansome Street, there is very little of this going on, and the reasons are obvious. Montgomery Street really is a canyon. It has no spaces or snippets. It has very little sunlight. This is the kind of thing we have to avoid in the future downtown. It has to be avoided at all costs. To do that, we have to find ways to protect these other open spaces. They may be accidental and somewhat ephemeral, but they are what makes the downtown tolerable as a work environment for the people down there. **H.3.1**

What is the point of encouraging owners to create snippets of space if there is no attempt or mechanism to protect them from shadowing by new buildings? Protecting the existing and proposed parks is obviously critical, but that is only half the battle. Most recreation downtown happens in the **H.3.1** streets and these snippets at all times of the day.

What is going to happen to the area South of Market, which right now is very low-rise? The EIR tells us nothing about the impact of the full buildout on all the streets in this vast C-3 area. So we'd like to see the overall shadowing effects of the full buildout dealt with in this EIR. As it is, it barely touches on this subject. There is very little in the EIR on open space. We feel that the quality of open space in the downtown should not be just left to chance. **H.3.1**

Thank you very much.

PRESIDENT ROSENBLATT: Peter Stern, and then John Behanna.

MR. STERN: Peter Stern. I'm a resident of San Francisco. There are a number of people in this country who do not believe in the public planning process, who don't believe in zoning laws, who don't believe, in short, that any restrictions whatsoever should be placed on private development and on growth. **Z.1**

I assume that because you have accepted appointments to the Planning Commission of the City and County of San Francisco, you do not number yourselves among those people. I assume you do believe it's legitimate for a public body to shape, to modify, and, indeed, to restrict previously unfettered growth when such growth begins to threaten the quality of life in our uniquely favored city. **Z.1**

More than most cities, San Francisco has very definite physical limitations. We have only so much land available for new housing. Our streets, bridges and highways have only so much capacity for traffic. I believe a fair-minded person would have to conclude that the level of development allowed by this Downtown Plan EIR would be much greater than this City could readily absorb, and thus would severely erode the quality of life in San Francisco. **A.1 D.3.1 E Z.1**

As Planning Commissioners, you are charged with protecting the livability of our City -- for all residents. In my opinion, this Downtown Plan EIR, because it omits consideration of the impact of development in Yerba Buena Center, Mission Bay, the Van Ness Corridor, the northern waterfront, because it ignores the removal of vital support service businesses from downtown, because it does not attempt to offset the impact of commercial development upon affordable housing, because it grossly underestimates transportation impacts, because it completely ignores financing for necessary transit improvements -- for all these reasons, this document is utterly inadequate as an overall Environmental Impact Report on downtown growth in our City. **B.2.1 B.2.2 B.4.1 D.4 D.5 E.1.1.1 E.1.5 E.1.9 E.2.1.2 E.2.7 E.3 S.2**

For you to approve this document would be to abdicate the responsibilities of your office and your responsibilities to the people of San Francisco. Therefore, I respectfully urge you not to adopt the Downtown Plan EIR in its current form. **S.2**

Thank you.

PRESIDENT ROSENBLATT: John Behanna, and then Esther Marks.

MR. BEHANNA: I'm John Behanna, I am here in part from the South of Market Alliance. I am an engineer, planner, and I sell real estate South of Market, commercial/industrial. I also have lived South of Market for ten years, and I hope to live there a few more. **Z.1**

It would appear to me that the basic model upon which you have planned South of Market is a dated model that presumes it will be used for back office space -- that is key punch, things like that. Not services; back office -- ancillary to the main buildings downtown. **A.4 B.1.1 B.2.1**

I would suspect that if you made a current evaluation of back office needs for basically data processing, some other generation of documents, that you would find that because of the revolution in communications, that you don't need back offices in San Francisco; they're going over to Concord and Walnut Creek. And if you go over to Walnut Creek and Concord and see the way they have done it there, you'd say, "My goodness, how civilized! People actually live in the community where they work." **B.1.1 B.2.1 D.2.3 D.3.2.4**

I say to you, reevaluate that need for back office space South of Market. When you create a large building, you create a floor space of maybe 20,000 to 50,000 square feet. Small businesses don't need that kind of space. The service businesses that are currently really moving in South of Market -- and we're writing five-year leases for service businesses -- are people like video producers, computer producers, computer sales organizations, and, of course, all the sales-related businesses that apply to the Showplace and the Galleria. **A.4 B.1 B.2**

So I am saying, if you want long-term health for the City, don't plan that area for back office spaces. Small businesses need two to 5,000 square feet. You can't get it. I get people calling all the time; they want small space. You can't get it in a large building. You can't break those buildings up that way, and you can't get access for services in

A.4
B.1 B.2

trades.

I also represent the Alliance, South of Market Alliance. As far as the EIR is concerned, it is as if everything that the South of Market Alliance is for, they have completely disregarded. There is a big community living South of Market. It certainly is going to be adversely affected by the current plans.

A.1 A.4

The transportation down there, as the cab driver so nobly said, it's gridlock. If I want to go back to my office or my place of work between the hours of 3:00 to 5:00, I don't either leave there or go there. I just avoid South of Market. And it starts at around 2:30. The parking situation there is, of course, impossible. The only beauty of the parking is that you can't build offices because you can't get parking spaces. And it's very hard, but it's being done -- they're knocking down residential spaces to get parking lots so they can get a dollar and a half a square foot for their office spaces down there.

A.4 .4
E.3.2 E.4.1 E.4.2

So, in short, I say: you can't, obviously, from all the problems we have heard about, you can't legislate who is going to use what. I am only asking you to hold down the height limits South of Market so it makes it difficult to create large plottage and knock down the existing buildings that currently provide a lot of space for trades that are moving in there, not back office. A B.4.1

Thank you very much.

PRESIDENT ROSENBLATT: Esther Marks, and then Tom Jones.

MS. MARKS: To begin with, I would like to read a policy statement from the Downtown Plan, and I'd like read it just to bring into focus again what the social, environmental cost of downtown development is.

Z.1

I'd like to begin. "Downtown office space expansion during the last two decades has greatly shaped the City economically and physically. This growth, while supporting the economic vitality of the City, has not been without environmental and aesthetic costs. As public facilities become strained, the marginal costs and benefits may indicate limits to growth. Furthermore, the social and environmental costs must be weighed against economic benefits." Z.1

And then they list the costs as including: "Effects of overly-large office buildings on the scale and character of the city. Destruction and replacement of many buildings with significant architectural merit. Reduction in remaining areas of sunshine reaching streets at publicly accessible open space. Effects of street-level winds on the pedestrian. Effects of commuter traffic on downtown congestion, air pollution, energy use, and consumption of land for parking. Overburdened public transit systems that connect the downtown to the City and surrounding region. Increased traffic noise. Effect of increased employment density on existing services and increased pressures on a limited housing supply. Conversion of existing housing, retail and service commercial space to office space." **Z.1**

I would like to also add that another cost is that there will be even more pressure for increasing the density of San Francisco residential neighborhoods. **D.3.1**

Now, I think that the social and environmental costs far outweigh the undocumented economic benefits. I urge the Commission to adopt an annual limit. I urge you -- especially considering the permits that have already been issued are such that this Plan really would not affect any kind of development realistically until the year 1990. I would like to also point out that in the EIR, on the table which is titled "Relationship between between Objectives and Policies of the Master Plan and the Downtown Plan," on the section of the Residence Element of the Master Plan, it states, "Objective 5, to provide housing affordable by all income groups, particularly low- and moderate-income households."

A.2 P.1

Now, for the Downtown Plan, the response is "no recommendation." A.2

Another item under the Residence Element of the Master Plan, Objective 5, Policy 8: "Ensure that office development and higher educational institutions assist in meeting the housing demand that they generate." A.2

Under the Downtown Plan, "no recommendation." Under the Master Plan, the Residence Element of the Master Plan, again, Objective 9, "To address needs through a coordinated regional approach." A.2

The Downtown Plan, "no recommendation."

The Residence Element of the Master Plan, Objective 9, Policy 1, "Encourage the balancing of regional employment growth with the development and growth of housing in the region." A.2

The Downtown Plan, again, "no recommendation."

I can only conclude that the reason that there are no recommendations is because the amount of office construction that has gone on is so out of control that it really is not possible to develop a plan that will straightly deal with these issues. A.2

Thank you.

PRESIDENT ROSENBLATT: Tom Jones.

MS. HALLIDAY: I'm not Tom Jones, but he went out for something to eat and probably got tied up in traffic or something. And I am Barbara Halliday, and I am also from San Francisco Tomorrow. So if it's okay with you, I will speak now in place of him. **Z.1**

PRESIDENT ROSENBLATT: Are you speaking for him?

MS. HALLIDAY: I'd like to trade places with **Z.1** him. I signed up to speak, and I'm probably on later.

PRESIDENT ROSENBLATT: All right. Could we have your name again, please.

MS. HALLIDAY: Barbara Halliday. Because I think, well, Tom really has a lot more detail to present to you than I do, I would just like to say that San Francisco Tomorrow has been looking at this plan. I appreciate Mrs. Bierman's comments, recognizing the time that many citizens have spent looking at this, and we do it because we care about the City and we want to participate in the planning process. **Z.1**

Because it's already been used today, I'll refrain from asking you, "Where's the beef?" But I would like to ask: Where are the realistic assessments and serious solutions to the meaty problems of transit and housing that already exist in the City and that are going to be made worse by the office growth that the

Plan recommends? D.3.1 E.2.2

The Plan does mention these problems and attempts to deal with them, but, as many people have said, and we'll point out to you today, I think it grossly underestimates the problems while, at the same time, overestimating the City's ability to deal with them. I think it's looking at the City's ability to respond with rose-colored glasses. D.3.1 D.5 E.2.2 E.6.2

It's not fair to tell the public that the City can handle traffic and transit problems that projected growth will cause but not tell us how much it's going to cost and where the money is going to come from. It's not right to blithely assume that highway crowding will be alleviated by getting more people, more motorists to double up, but remain silent about how miserable the condition are going to get on that highway before that is going to happen. E.1.4 E.2.1.2 E.2.7 E.3.3

Now, the City has tried to do many things in the past few years to attempt to make these problems better. And yet the problems have grown worse, as headlines in the Chronicle this week pointed out in regards to traffic in particular. E.1

I don't think the Plan deals realistically with the present situation, and I don't think it's offered realistic solutions to the problems. Z.1

I'd also like to ask if you have considered the social and even maybe the health costs of the projected growth. How many ulcers are going to be caused by traffic jams and crowded Muni conditions? How many children are going to grow up lonely and neglected because their parents, both of them, have to spend four hours a day commuting just to feed and house them, considering the high cost of housing we have in the City today. **Z.1 D.3.2.4**

Now, the last thing, the beefy issues of housing and transit. I think the Plan has devoted a highly disproportionate amount of space to frill issues such a design and skyline. If the density question isn't taken more seriously, the people on the ground are going to be too preoccupied just trying to move in order to have time to even think about the artistic design of a building or shape of the skyline. **A.1 H.4 E.2.2.3**

If I had to characterize the tone of this plan, I'd call it an attempt to make San Francisco a designer city -- chic, trendy and superficially attractive, but, like designer jeans, overpriced, uncomfortable, and impractical. We all know how hard it is to move in a pair of jeans that are too tight to accommodate the flesh that has to be put into them. **A.1 Z.1**

Others here from SFRG and SFT and many other groups have offered more serious comments and suggestions on how this plan should be changed. SFT thinks, in particular, that the annual limit is one of the more workable solutions and should be considered more seriously, especially since we don't know where the money for the transit improvements is going to come from. **E.2.1.2 P.1**

The developers have taken you to court on the inadequate measure that you tried to enact to help that problem. So I hope you will listen to us. I hope you'll give these comments serious consideration before enacting this blueprint for San Francisco's future. **E.2.7.2 Z.1**

Thanks.

PRESIDENT ROSENBLATT: Natalie Friedman, and then Babette Drefke.

MS. FRIEDMAN: My name is Natalie Friedman. I am a resident and property owner in San Francisco, and I'd like to just offer you, in summary, a few environmental solutions which you could use. **Z.1**

No. 1 is the sewers. You don't need to connect to the City sewer if, one, you recycle within each building all the waste water -- A, purify and reuse the drinking and wash water and, B, convert toilet sewage methane gas converters, which is being done in Sweden. This power could be used in the buildings instead of using the high-priced electric power which is coming in and causing us to have nuclear catastrophes. B, power. Each building should be required to have solar and/or wind power. They could sell the excess back during peak periods and use PG&E for a backup. **F.1.3**

A health requirement would be in San Francisco, which is called "the air conditioned City," to have all windows in offices that open, and eliminate air conditioning. **G.1**

Number C is quakes. I was looking at the books from the 1906 quakes, and the problems were fire and plague. And plague was from the sewers and sewer rats that carried the fleas. The solution with the sewers which I propose, if each was self-contained in a building and rat-proofed and quake-proofed, you wouldn't have the plague problem. And the gas lines, they have now invented something that's called the quake-shake cutoff valve, and it runs approximately $150 plus installation. I recommend that you use these. **K.6**

And I would like to see the transit and housing problem projections become a reality before any more commercial development is allowed. **P.2**

Thank you.

PRESIDENT ROSENBLATT: Babette Drefke. Joe Lacey.

[Inaudible response from audience]

PRESIDENT ROSENBLATT: Did anybody hear what he said?

SECRETARY WOODS: He'll speak at the reconvened hearing later. He hopes there will be another hearing.

PRESIDENT ROSENBLATT: Thank you. Donald Nieto.

MR. NIETO: Good afternoon. My name is Donald Nieto. You all know me by now. I have been here a couple times. Z.1

Listening to all the professional speakers ahead of me, I very easily get the message that they're not fully for your EIR. Well, nor am I for your EIR, for the reason that they cited, which I in no way could possibly restate, nor can I further reiterate how strongly I feel about how they feel about San Francisco. Z.1

I am a native San Franciscan, but I realize that that doesn't carry any weight. I can only say that as a native and being born and raised in San Francisco, I knew it when it was perfect, when we didn't have a sewer problem. The sewer disposal systems that we had were adequate. They handled the population of 700,000 people. And we were able to get shrimp out of the bay.

F.1.1 Z.1

Obviously, today, to go ahead with your plans, you have to tax me $30 a month in order to build the super sewer, which is going to further destroy an area outside the San Francisco Bay. F.1.1

Now, four or five or six years ago, when Mayor Feinstein ran for Mayor, I was one of the naive people who voted for her. When Mayor Moscone ran for Mayor, well, I wasn't voting in those days. That showed you how much faith I had in the government or how much I thought you really cared.

Z.1

I cannot forget the memory of when I left the Army in 1964 and came home to San Francisco and perched myself on top of Twin Peaks and looked around, and I actually saw seven hills. You are lucky if you can make out four hills now.

H.4.3

I am not one for the further gentrification or the further upbuild of San Francisco. I didn't vote for Mayor Feinstein so that she could make San Francisco an international city. I never thought that's what I would want, considering what New York looks like, Chicago, and what have you. I sort of hope perhaps that you would all have the wisdom to see that what happened there is what we don't want to happen here. Consequently, just so my own mind can stay preserved and be happy -- you could just remind me to back off the mike. You don't have to turn it down. Just makes me speak a little louder. A.1 Z.1

I don't have a whole lot to say. You heard the things I said, and basically I think you all understand that I am somewhat powerless. It's going to be up to you. You can go ahead and go along with the magnificent economic schemes that you have and build a corridor with all these little frame houses, these steel-frame houses with lots of glass and lots of stucco and the whole trip. And we all realize it's been, what, 54 years since we had an earthquake in San Francisco. And that was right along the San Andreas Fault, apparently. I would not go ahead and do what you are doing, considering we have that sort of a problem. But if we are doing this simply for economic reasons, then I think you have to review the economics. K.7 Z.1

You know, in the sense, when I lived here in this City, it was almost like living in Marin County. We were getting a new swimming pool; we had a nice ballpark that we could go to. We had all the amenities without having to be some kind of a superpower on the face of this planet. And I don't want to see it. Z.1

I can't offer you any suggestions. You are the ones that are supposed to be looking out for the individuals. But if I never voted 20 years ago, it's obvious I didn't think that you really were looking out for individuals. Novels upon novels upon novels tell me that you are not for the people. You don't care about people. Z.1

And pretty much the way I've been, feeling helpless all these years before that very special day that got me to come down to City Hall to look at each and every one of you, to listen to some of your sick jokes, the things you laugh at, tells me that you are existentialistic people; you live for the moment. You are going to live only for your own life -- as long as you live somewhere in Nob Hill or cross the bay, where you don't have to subject yourself to the stigma that's being attached to San Francisco. And obviously, if it doesn't concern you -- we're all the same. I am no different than you, except that I wouldn't do what you're doing. Z.1

And, once again, you got plenty of expertise here today giving you very logical reasons that I can't give because they have been into it a lot longer than I have. And I do wish you'd pay attention to them. Not just because we might be subject to an earthquake someday. Suppose we do have that quake? I hope nobody dies. But can you think of the billions of dollars it's going to cost? K.4

PRESIDENT ROSENBLATT: Thank you.

MR. NIETO: I sat here a long time along with all the rest of them. I get sleepy, my head gets sleepy. I get sick being here. But I'll stick with it so long as somehow you tend to grasp my message. Z.1

PRESIDENT ROSENBLATT: The next speaker is John Malley, Howard Strassner, and then John Diamante.

MR. STRASSNER: My name is Howard Strassner, and I represent the Greater West Portal Neighborhood Association. And I am here to tell you that even those neighborhoods that are some distance from the downtown are really concerned with the impacts that the downtown growth has on neighborhoods. Z.1

In my work, I am also a member of the Coalition of San Francisco Neighborhoods, and in my work, I was directed to study the Transportation portion. When I did that, it became apparent to me that there are 52 mitigations listed, and none of them are promises, and so we started to work with that. How can we get the mitigations built? Because if the mitigations are built, they won't have transportation impacts. That is what the report says. It's probably true.

E.2.1 P.1

So we came up with the concept of a scheduled mitigation -- that is, don't build the high-rises till you have the transportation in place. And on a preliminary basis I took this to my neighborhood, and they said, "That's great, because we are sick and tired of having to fight our way into a Metro to get home in the afternoon." If we know that the cars are going to be coming, we are going to get home. So that means that this minimizes the impact in transportation. P.2.1

This is a pretty simple approach, it seems to me. And every neighborhood, not only in the City, but in all the counties around, have that same right, to know that all of the transportation necessary to get people to San Francisco and, as you heard earlier, to get them to downtown Oakland, will be provided about at the same time that the people are going to want to get there. That is very simple. You don't have to have an absolute limit of 500,000 square foot per year, but you can say, "Gee, in the year 1988, BART has to order 30 cars, Metro has to order 40 cars," whatever it is, this has to happen. If that doesn't happen in '89, we don't permit any more downtown construction. That is pretty straightforward to me. P.2.1

The same thing can happen with housing.

Because if you don't get the housing built someplace, they're going to be cra~~s~~hing into the West Portal. You are already pressing us for secondary units. People always said, "Well, why can't you upzone this?" **P.2.2**

Well, you know, you're now looking at areas that can accommodate thousands and thousands of units. You're looking at the SP area; you are looking at the Rincon area; looking at lots of areas in South of Market. If you will schedule these things and zone them to be housing, perhaps high-rise housing, then you would get the number of units required. **P.2.2**

I ran the calculations on my own to see how many units were required. By the year 2000 -- only considering what the EIR says about the C-3 growth -- you need 40,000 more units. Now we are getting 600 a year. That leaves a 30,000 shortage, if nothing changes. I am saying to you guys that you should say that, what, two, 3,000 have to be built every year; if those get built in the previous year, then you'll allow the downtown growth to go on. **P.2.2**

Now, obviously, you can't build two things in the same space. There may be a limit. One of the things that happened in this City, if you extend the calculations, you come to an increase in population of 90,000 people by the year 2000, and that is just based on your own numbers. That doesn't include all the other office growth that probably is going to happen. These things have to be accommodated. You can't close your eyes to it. If you have a scheduled mitigation, you will be able to accomplish it. **P.2.2**

Now, back to transportation. They go on with 52 mitigations, and there is no promise of them. I'd like to suggest the 53rd, which will tend to make the essential ones of the other 52 happen. And this I brought up in my Steering Committee at Greater West Portal, and they approved it. And that is, schedule annual increases in the parking tax. When the parking tax gets sufficiently high, people will double up in their cars, like the EIR says they're going to. They will squeeze into the BART trains. They will do all the things that sensible people do, because it gets too costly. **E.6.4**

And if you do it right and you have a small annual increase, it's continuous, no one can jump up and down; he knows it's going to happen. The people in San Mateo will say to their county people, "Look, it's going to cost me an additional $5 a day to park in San Francisco. You better finish that BART connection. You better come up with the money to do it." **E.6.4**

Not only that, while they're beating on their

people because they don't want to pay the high parking taxes, we are going to have the funds to pay our share of all the transportation that we need. Just a simple little thing, and I think it's reasonable that you had a tax that approached $10 a day for 200 or 250 days a year, working days. Because if you base it on working days, if you would assess each parking spot $250, that would be -- no. That would be $2500 a parking spot. That would come to $10 a day. Those that are used for 24 hours a day, those that are used seven days a week would obviously pay less per day on a prorata basis. E.6.4
But just extend it.

Now, we have 50,000 parking spots today. You get $2500 each. That is $125 million. Now, maybe that number is high. Maybe the number of parking places will be decreased. But, anyway, if you have numbers like that, you are going to be able to afford to buy Muni cars that you need; you are going to be able to afford to do all the things transit-wise that you need to get the job done. That should be considered as a real mitigation in order to maintain the San Francisco that we love. E.6.4

The other side of this scheduled mitigation is, which is important, if you just build this darn stuff and people can't get into it and can't find a place to live nearby, it's going to go vacant. So it's going to serve the developer's own interests to see that mitigations are built.

P.2.4

And we envision, or I can envision, anyway -- my people in the West Portal did -- that if you come to them and say that you can't build this next large high-rise because we didn't build enough housing last year and didn't build enough transit last year, they are going to get connections with their friends. They're going to lean on the other counties. They're going to lean on their housing developer friends. That stuff is going to happen. And we are going to have what we need to keep the City going.

P.2.4

And people can say, "Well, it's okay for the West Portal to say there should be high-rises," but if you think about it, what we are trying to do is preserve a single-family neighborhood. In the progression of things, if these high-rise living units are built downtown or near the downtown, this will be the progression for people: They'll move in there when they first come to City; they will move out further; and ultimately they will be able to afford -- Lord knows what a West Portal house will be then. But they'll be able to be in the City and be attached to the City and find a place. And if some of those units are condominiums, maybe that will help them afford houses. D.4 D.5

I think it's realistic. We are not just being a selfish neighborhood and saying, "We want to preserve our neighborhood." Sure, we want to preserve it, but it's kind of a balanced thing. If we go down the tubes, then you are going to be pressing on the St. Francis Wood and all that. It is possible that there can be more high-rise living units this City. And that is what it takes to maintain the single-family D.4 D.5 neighborhoods that we have today. Thank you.

PRESIDENT ROSENBLATT: John Diamante, and then Tony Garcia.

MR. DIAMANTE: John Diamante. I have been a cable car driver and taxi driver in the City. I am here as Vice President of Threshold, International Center for Environmental Renewal. Threshold is perhaps best known for its ecological principles for economic development. And Threshold for 12 years has done a lot of ecological and planning work, from the national parks in Nepal to the well known Atlanta 2000 project. Z.1

For the record, Mr. Chairman, could I have from somebody an approximate dollar figure that this document represents, please. S.3

COMMISSIONER SALAZAR: We asked that question earlier, and -- $280,5000 or so.

MR. DIAMANTE: Isn't it the case that this document builds on approximately a half million dollar study, its precursor? S.3

COMMISSIONER SALAZAR: We did not commission the study. The Chamber of Commerce did a study that I believe cost about that much. It was about $550,000, as I remember. S.3

MR. DIAMANTE: I submit, honorable Commissioners, that we don't have a very good value here for three-quarters of a million dollars. S.3

For one thing, it's not even proofread, which to me as an editor is especially annoying. Copies of it were not available in plentitude, and copies that were, of course, were unbound, which does not represent a courtesy to citizens spending their own time trying to get through this. S.1.3 S.3

I hope to submit testimony in writing. I will do that. And I am very grateful that you have extended that comment period until early June. I think that was in order. So I would just like to make a few comments today. S.1.3

I think you have been appealed to all afternoon and you will continue to be appealed to by people in writing to make this Commission something Z.1

other than what it's been. We stand and sit here after 130 years of a famous San Francisco tradition, the gold rush, the speculative dollar. And everything that's happened in this City has enshrined that tradition. Z.1

And now, finally, after 20 years of nitty-gritty, serious neighborhood politics -- which the courts have finally recognized. After suit after suit, after appeal after appeal, courts have finally recognized the legitimacy of all the criteria about which people have spoken this afternoon, pitted against the holy right of the almighty dollar to reign supreme in San Francisco, in this small, peninsular space of limited assets, limited amenities, and limited physical growth. Z.1

You are being appealed to for housing. And I think everybody has documented that this study simply doesn't address the crisis in housing. We can all recall many dramatic examples. Mrs. Chapman, I think, gave quite a good one several remarks ago. I remember the International Hotel has a symbol where money that allegedly had been made by a whiskey monopoly in an Asian country was funneled out of that country, allegedly illegally, to the United States and used to buy a building that was the cornerstone of a community under seige there, the Filipino community, which was some decades old. And we know that site still stands empty and symbolizes the current crisis in the Tenderloin and South of Market for low-income housing in this City. **D.3.1 Z.1**

You are being appealed to on the grounds of transportation, which I can speak to personally as a native son and someone who worked in these sectors as a public servant. This study simply does not address the regional demands of high-rise growth, least of all transportation. It's pretty clear that we've got to have transportation in place before we allow these high-rise buildings to continue, before we allow the impact of commuters, including or Mayor, and all the parking and the pollution and the badland use that hardtop and asphalt and parking facilities represent. **D.3.2.4 E.1.5 P.2.1**

You are really being appealed to, after 130 years, to look at the impact San Francisco is having on contiguous communities, on the bay region, on the physical assets of the bay, which are under seige, of course, from Southern California, and all the communities that take their cue or are trying to hide from the bedroom and the commuter and density effects these high-rise developments are having. **B.2.1 D.3.2 E.1.5 F.1 N.3**

You are being appealed to, I think, for leadership on the question of waste management. We have this terrific boondoggle of the Waste Water Project, this modern Roman sewer technology, when composting is clearly called for here by most of our residential units and climactic conditions. There is no place to put the waste. It's immoral to put it in the ocean and further pollute the Monterey and Santa Cruz fishery. I think this Commission is being appealed to to look at the impact these buildings are having in that respect. **F.1.1 F.1.3**

In just simple terms of architectural amenities, I think you are being appealed to to be imaginative. You are not, clearly, being asked to serve here as patsies or baboons or mouthpieces or rubber stamps of any executive or any City agency function. You are being appealed to as individuals and as a body for imagination to recognize the realities here and now in 1984. **H.2 H.4**

It's really inconceivable to me as a layperson that buildings should continue to be built in San Francisco with fixed windows, windows that can't be opened to take advantage of fresh air -- that these energy-intensive, air conditioning plant buildings should continue to be erected in San Francisco and the remarkable energy drain they represent. I don't understand it, and I wish the Planning Commission in this simple, almost esthetic respect, would take some leadership as far as standards. G.1

You have been appealed to the over the past two decades by neighborhood groups and in numerous electoral fights to represent, as you have done in the vote of North Beach last week, to represent the interests of diversity, of small neighborhoods, and especially of family life. Z.1

I don't think it's germane here to sketch the entire complex of results that are a consequence of a No. 1 cash economy based on tourism, the transient labor that brings in, the multiple singles in the dwellings that force out single-earner families; the heavy weighting toward asexual or skewed sexuality that a magnet city for people -- for busboys and waiters and transient service industry, tourist industry employment -- represents. Z.1

I think you are being appealed to by families all through this City, by neighborhoods, to draw the line. I think the future of San Francisco may well be that we will see high-rise buildings marching all the way down South of Market, all the way down China Basin, all the way to Islais Creek, and we will eventually have a complete Manhattan here -- and timesharing. And all these lamentable aspects of Manhattanization will extend all the way to Ocean Beach and the Lake Merced watershed. **B.1 B.4.2**

You are being appealed to by all the thoughtful people who come here this afternoon and the people who are going to fight acceptance of this study, to look at what San Francisco has offered people over 130 years, to save it. It cannot offer everybody these things for the next 10, 30 or 100 years. Some annual limit is in order. These impacts suggest some imaginative measure by this Commission or even imagined in the minority reports. **P.1**

I submit, this report is really unsatisfactory. It says very good things. It's got noble aspirations in terms of landmarks. It's done a lot of thoughtful work. There is some really dedicated, creative work in here that is subject to transportation brokers for new high-rise buildings that would try and lessen, mitigate the problems of how people can find transportation, all these Mr. and Mrs. Ego trips represented in that letter in the Chronicle this morning. These are good ideas. But the dimensions of the problem go far beyond the study, and they are known to all of us on this side of the rail. They should have been apparent to you, and I think you should have commissioned and should now commission work that addresses the regional aspects and all the other aspects. **B.2.1 E.1.4 H.1 N.3 Z.1**

I think you should make a finding that this document is unsatisfactory, not only as a value for the dollar spent by the private sector and the City, but simply because it does not meet any of the things people are speaking to -- housing, amenities, the character of the City, the future of families, single or dual-income earner families in the City, the very amenities that bring people here, the goose that lays the golden egg, and all that, all these things -- air pollution, waste management, and, above all, land use, that people will keep addressing. **S.2 S.3 Z.1**

So I hope you will send this study back to the public and back to the people who wrote it and hear the plea by communities around the bay, that San Francisco cannot heedlessly continue to accommodate speculative interests, real estate interests, that there are other interests as prime, as important -- family, community, mixed economy, mixed labor force, blue collar, white collar, and all the rest of it. **A.1 S.2**

We need public servants in this City who live in the City, who connect with the children in the City, who are involved in their future -- far beyond the POA and these kind of things -- so kids are not growing up on the streets tended, or untended, by commuting public servants. We need a city which feels a stake in its children, and, whether in black-and-white planning or in day-to-day decisions, follows that course. **Z.1**

Thank you very much for your time.

PRESIDENT ROSENBLATT: Tony Garcia. John Holtzclaw. Then Dale Carlson.

MR. HOLTZCLAW: President Rosenblatt, members of the Commission, I am John Holtzclaw, the Chair of the Bay Chapter of the Sierra Club. **Z.1**

Last year we testified on housing and bulk and wind and shade, and so on, many other issues. I am going to concentrate on transportation and air quality today. **Z.1**

We are very concerned about the future transportation problems in San Francisco, particularly in light of the 100,000 additional downtown jobs projected in the Plan. San Francisco, and especially downtown, cannot survive without adequate transit. Otherwise, widespread and long lasting congestion will stop traffic, including the buses and trolleys, and will choke us with toxic exhaust. Downtown streets often exceed safe carbon monoxide levels today. Enormous parking garages will be required. Downtown roads cannot be widened at the expense of already congested sidewalks; you can't move the buildings back to widen the roads. The only solution is massive increases in transit, as the proposed Downtown Plan acknowledges. But how will we pay for these transit improvements? **E.2.1.2 E.2.7 E.6.4 I.4**

Are these anticipated traffic problems just speculation? In Monday's Chronicle, "Bay Area Drivers Are Going Nowhere Fast," which I am sure has been referred to many times today, they reported congestion was up 73 percent between 1980 and 1982 in San Francisco. It reported that Bay Area bridge traffic is up 12 percent in the last year alone. **E.3.1**

Traffic. The DEIR, Draft Environmental Impact Report, asserts that the use of automobiles will decline one or two percent -- decline one or two percent -- by 1990. This is not supported by the trends reported by the Chronicle Monday. The DEIR also predicts parking demand downtown will increase 13 percent between 1984 and 1990, and another 14 percent by 2000. And 3,700 parking space deficit will, quote, "Overflow into adjacent and outlying residential and commercial areas," end quote. If auto use will be down by one or two percent, why is it that parking will become more congested and parking places will overflow into the neighborhoods? That is an inconsistency.

E.1.4 E.4.1 E.4.2 E.6.4

In light of recent traffic increases, the DEIR traffic projections appear to be seriously flawed and underestimate the traffic. **E.1.2**

Transit. The DEIR contains a laundry list of transit improvements needed. But how are we going to pay for these? Last year, the Metropolitan Transportation Commission, MTC, identified seven billion dollars in transit, new real transit, requested, but only one hundred to two hundred million dollars a year of Federal, State and local revenues to pay for these. At that rate, it will take 35 to 70 years to build the new rail transit we will need by 1990, six years from now. And that would leave us with no money for non-rail transit, like buses and trolleys from Muni, like A. C. buses, Golden Gate Transit buses, San Mateo County buses, and so on. **E.2.1.2**

We need new and larger revenue sources for construction and for operations. We urge that the DEIR not be certified until, one, funding is available to build all MTC's new start proposals and the Southern Pacific electrification extension to a Mission Street terminal near the Financial District and light rail lines on Geary and Third Street and construction started on all of these. **E.2.1.2**

Two, that the Downtown Transit Assessment

District be implemented. You remember the Downtown Transit Assessment District from four or five years ago? That that be implemented. **E.2.7.3**

Three. The Financial District be made an auto-free transit mall, major arterial streets be made transit-only, and contra-flow transit-only lanes be implemented on major one-way streets. **E.6.3**

Four. Future office projects be approved only if non-crush-level peak-hour transit service is available. Approve projects only if adequate transit service is available. **P.2.1**

Air quality. The DEIR's assertion that Federal ozone standards will be met in 1987 and will continue to be met until the year 2000 can be faulted on at least two counts. One, the transportation or traffic increases that they use there appear to be seriously underestimated, judging from the report Monday in the Chronicle. Two, the 1982 Bay Area Air Quality Plan, upon which the DEIR's assertion is made, optimistically predicts that the ozone standards be met -- just barely met -- by 1987, and then, that ozone will increase, air pollution will get worse, and we will not meet the standards in the year 2000. Progressively gets worse; ten percent for the year 2000. **E.1 I.5**

The DEIR also predicts increases in NOX, N-O-X, primarily nitrogen dioxide, emissions due to the Downtown Plan. Well, nitrogen dioxide becomes acid rain or acid fog when it combines with fog or rain -- nitric acid, to be specific. Acid rain and acid fog are already problems in California. Unfortunately, the present Federal Clean Air Act does not address acid rain, acid fog; it does not try to control it. However, where the Clean Air Act is silent, nature is not silent. Our lungs suffer, forests and farms suffer from acid rain. California farm losses to air pollution are estimated to annually be one billion dollars. **I.6**

I urge you not to approve a plan that allows nitrogen oxide emissions to increase. **I.2 I.3 I.6**

PRESIDENT ROSENBLATT: Dale Carlson, and then I have two cards that are a bit confusing. Henry Kroll and Regina Smeed have both signed up, but both indicated they do not want to speak, and I am not sure how to interpret that.

So go ahead, Dale.

MR. CARLSON: Dale Carlson, President of the Stanyan-Fulton Street Neighborhood Association. **Z.1**

Commissioner Klein, I know you are feeling deprived today because you didn't get to read a newspaper, so I thought I'd read you some of mine. Starting with the editorial page, there is a wonderful little cartoon here of Air Force I on a runway in Peking, and it depicts Richard Nixon disembarking, with a big smile on his face, his arms raised in his familiar "V" for victory hand sign. And a voice from a cartoon balloon in the back of the plane saying, "Gee, Mr. Reagan, I don't know who invited him." Z.4

On the front page of the City Section there is an article about how SF dealt with the earthquake the other day. It's by Corrie Anders. And it starts, "In a major earthquake, it would take San Francisco's Office of Emergency Services from three to eight hours to set up full operations to cope with the disaster. The office would have to move its personnel and equipment nearly a mile from its clerical offices at Seventh and Market Streets to the Central Fire Alarm Station at Hayward Playground," assuming it can get out at Seventh and Market. "If a major earthquake struck while City employees were on the job, it would take three hours for the Central Emergency Office to swing into full operation. It would take eight hours on a weekend," if people can get into town across the bridges. "That's the time it takes for people to pull on their socks and start to do business," Dave said.

But don't get the impression that nothing is being done for three hours," he said, "noting that emergency personnel would be working constantly." K.5

He closes this article by saying, "If we had a 6 on the Richter Scale scale on the San Andreas Fault near the Golden Gate, Marin County or Daly City, then you could expect damage in San Francisco to a lot of old, old buildings" -- the ones I assume Grant Dehart is trying to save through the TDR's. K.1

There's an editorial in the Examiner today as well. "Are You Ready for the Next Shake?" "We Were Very Lucky," read an Examiner headline yesterday, "and indeed we were. Today's earthquake, which may have been the strongest in 73 years, caused only a few minor injuries and property damages, at least away from the epicenter, and was relatively modest. It's important now to review basic safety precautions. These are fundamental. Outdoors, keep away from buildings and power lines." K.1

Just stand on the street and they'll come down to you. No problem. K.1

"Remember the 911 emergency phone number, and those outside the 911 area should know police, fire, and ambulance numbers." K.5

Now, folks, if we have an earthquake that size in San Francisco, do you really think the telephones are still going to be working? I think those kinds of questions need to be more seriously addressed in this EIR. K.5

I will submit my newspaper to Commissioner Klein as Exhibit B. K.1

On regional growth, I --

COMMISSIONER KLEIN: At the rate we get paid for these Commission meetings, I need the quarter.

MR. CARLSON: I attended a luncheon meeting at SPUR a week or so ago. Commissioner Rosenblatt was there as well. And we heard a presentation from a woman at U.C. Berkeley who recently completed a study of office growth in the 680 Corridor. She started that report with a rather amusing story. You don't mind if I repeat it, do you? Z.4

Two Contra Costa real estate developers decided to go camping for the weekend. And so they packed up their bags and their backpacks and tents and cooking gear, and they hiked off to the Sierras. Z.4

On the way, they discussed the real estate market in Contra Costa, and was it going to soften, and were 20 and 25 percent vacancy rates going to slow growth in that part of the Bay Area? Z.4

They got to their spot in the Sierras and set up their camp, pitched their tent, had their fire, and they had a nice hearty meal, then retired to their sleeping bags.

Several hours later, in the middle of the night, Real Estate Developer A was awakened by a lot of rustling in the bushes outside the tent. And he opened the flap and looked out, and there was a huge bear rumbling about in their camp. Closed the flap, started pulling on his clothes, started lacing up his his running shoes.

Real Estate Developer B was wakened by all this and said, "What are you doing?"

And Developer A said, "Take a look outside the tent."

Cracks the flap, sees the bear, looks back in, astonished, and says, "My God! What are we going to do? You'll never outrun that bear."

Developer A says, "I don't have to outrun the bear. I only have to outrun you."

[Laughter]

PRESIDENT ROSENBLATT: You even tell it better.

[Laughter]

MR. CARLSON: You know, you get a Ph.D. in Economics and your sense of humor goes down the tubes.

I don't think this Draft EIR adequately assesses the impact that San Francisco development is going to have on the region nor the impact that regional growth is going to have on San Francisco. This Draft EIR says that as of 1981, we had 61 million square feet of office and retail space in the C-3-0 District. Since then, from 1981-1984, we built another seven million square feet. That seven million square feet is not addressed in the impacts assessed in this draft. From the Lincoln Plaza supplemental -- I have taken that list. About seven million square feet of additional space. **B.1.1 B.1.2 D.3.2 E.1.5**

This supplemental also lists 135 more projects that are either under formal review or have been approved but are not yet under construction or are under construction. And they total another 22 million square feet. And that is also not assessed this Draft EIR, and I think it needs to be. **B.1.2**

The draft also admits some 20 or 25 million square feet of office space that is under construction in Contra Costa County in 680 Corridor, and I will be glad to provide the staff with a copy of that study if they don't have it, because I think it's important for us to get a full picture of what's going on in a region. If all that office space is going to get built in Contra Costa, how much additional BART capacity are we going to have to supply for that growth? How much additional freeway capacity is it going take? How much additional housing is it going to take? **B.2 D.3.2 D.3.2.1 E.1.5 E.2.3 E.3.1**

The woman who did this 680 Study told us that the housing that was currently being built in Contra Costa County was intended to sell for between 150 or $200,000 and up, out of the reach of middle managers who were being moved to the East Bay by major San Francisco corporations, certainly out of the reach of 70 percent of the people who work in San Francisco, who work downtown in San Francisco. And yet the EIR says: We are counting on those East Bay communities to provide housing for our workers. **D.3.2.1**

They can't even provide the housing for their workers. They've got people driving in from Solano County and points north. How bad is that going to be? **D.3.2.4 D.3.3.4**

This EIR doesn't talk about the 18 million square feet of office space that's proposed in the 101 Corridor just south of the San Francisco County line. That is a serious deficiency. It doesn't talk about what's going on in Alameda County or Marin or any of the other Bay Area countries, and that has to be looked at. **B.2 D.3.2.1**

As a member and president of the

Stanyan-Fulton Street Neighborhood Association, I am interested in the impact that downtown growth has directly on my neighborhood. The transit methodology that's used in this Draft EIR, and it's a fairly recent shift in methodologies where you look at transit capacity over geographic areas of the City rather than on individual lines, assumes load factors are constant the entire length of the line; assumes that the load factor on the 38 Geary is the same at Ocean Beach as it is when it gets to the Financial District. And that is not true. That is not true for the 38 Geary and its respective express lines. It's not true for the 31 Balboa and its expresses. It's not true for the 5 Fulton, and it's not true for the 21 Hayes. **E.2.2**

In the morning, when those buses are heading downtown with workers, they're filled, sometimes by the time they get to Masonic, certainly by the time they reach Van Ness. So all those people west of Van Ness or west of Masonic are not going to be served by Muni, or poorly served by Muni. They're certainly not going to be getting the service they deserve and that they need in the future if we continue to build office space as the Downtown Plan calls for. **E.2.2**

I think that is particularly problematic when you take a look at the Van Ness Plan that this

Commission is considering. That calls for a substantial increase in the City's housing stock with very little provisions for parking. We are talking about building housing units; we're trying to keep the costs down. And by doing that, we are not going to provide parking. And we're going to assume and we are going to hope and we are going to pray that people will ride public transit instead of taking their automobiles. But if the public transit is at capacity and beyond by the time it reaches those folks, they're going to be in trouble. **E.2.2.3 E.3.2**

The Downtown Plan Draft EIR says that between 1981 and 1984, 1000 additional parking spaces were expected to be built in new high-rises constructed in the C-3-0 District. Well, it's 1984, and I'd like the staff to go back and take a look and find out exactly how many parking spaces we have built downtown. I don't think we reached a thousand. **E.4**

And because of that, we are going to have more commuters parking in our neighborhoods. That is a problem in my neighborhood. How many more cars are we going to have in the neighborhoods? Mr. Rulfe earlier requested a definition of what was the periphery of the downtown area. Does it include my neighborhood? And how many more cars are we going to get there? **E.3.2 E.4.2**

When you have commuters parking in the neighborhood, those are the folks that help contribute to overloading the transit system before it reaches half the people who need to ride it. We've got commuters taking advantage of the transit systems that San Franciscans are paying for. **E.2.7.4**

Finally, the Downtown Plan Draft EIR notes that there has been and there is going to be a substantial increase in automobile traffic over the Golden Gate Bridge. Thousands more cars. Lots of yuppies and their BMW's. And we all know about that. And yet somehow, according to this draft, all those additional cars over the Golden Gate Bridge are not going to be any problem in the Richmond or in the Marina. There's not going to be any increase in traffic and traffic congestion and traffic problems in the Richmond and the Marina and Cow Hollow, despite this incredible influx of cars over the Golden Gate Bridge. **E.3.2**

Now, I know you folks are omnipotent; I know you can work wonders and can do miracles. But some of my neighborhoods are a little more skeptical, so they'd like to know how it is that you can bring all these cars over from Marin, have them disappear when they get to the Presidio, and then magically reappear in the

Financial District, without going along Geary or California or Balboa or Lombard or Van Ness or any of those other streets -- I think it's a wonderful thing, but I'd really like to see you explain how you are going to do it. **E.3.2**

Thanks.

PRESIDENT ROSENBLATT: Henry Kroll.

MR. KROLL: Good evening. I had not originally intended to speak. I registered on the card to show my feelings and opinion that this report is inadequate, as many of the well-informed citizens have registered. **S.2**

I'd like to yield my time, though, to another well-informed citizen earlier called to the podium, Mr. Tom Jones, if that is permissible. Mr. Chairman. **Z.1**

PRESIDENT ROSENBLATT: That is fine. Let me ask: It is not your intention to speak tonight, then?

MR. KROLL: Correct.

PRESIDENT ROSENBLATT: Could I ask, before we move on -- the other speaker who signed the card, but it is unclear whether she wishes to speak or not, Regina Smeed.

MR. KROLL: She left.

PRESIDENT ROSENBLATT: She left. All right. Thank you.

The last two speakers that we have are Tom Jones and David Jones.

MR. TOM JONES: I want to to start by saying that we are not going to take on the Burtons quite yet. Z.1

I have worked with a group of architects, not all members of SFT, which I'm a board member of, in trying to take a look at an issue which I think may be eclipsed by some of the other concerns people have spoken to today -- but we think is very important -- and has to do with something I call perceptual density. Z.1

I want to talk a little about density, and I want to distribute -- unfortunately, I have copies only for the Commissioners and Mr. Woods and had given one to George Williams before -- an initial study we did showing what it will be like to be on various streets downtown from a pedestrian point of view in the next five years after the Plan's implementation and with cumulative impacts. If I could distribute these. H.3 H.4

Before we take a look at that, I would like to say that I think we are aware that the mechanism that has been developed for trying to take the pressure off of our landmark buildings, which we call Transfer of Development Rights, is a very controversial one. And I want to address that briefly. But in no way, I think, do myself or most architects I know, no matter what their vision of the City is, want to see our landmarks jeopardized. And in that regard, I can appreciate that the Department and the Commission has acknowledged the need to save landmarks and has tried to develop a mechanism, has taken a look in a very detailed study, the Sanger Study, at the problems of landmarks, and has come up with something that they feel manages a balance between what the supply of Transfer of Development Rights and the demand could be. **Z.1**

My concern is the EIR's conclusion, if there is an imbalance, is that perhaps we should make more sites available for receiving TDR's if, in fact, the system may not work out. I would advocate that the EIR ought to look also at the other side of the question. We could reduce the demand on landmarks and the demand for TDR's -- sorry -- the supply of TDR's if in fact we lowered the base FAR's. I would want to point that out, although that is not the substance of my comments. **H.4.1**

Let me walk you carefully through the drawings so we are not leaping ahead. The purpose of this was to submit material that we felt was inadequate -- that is, to supplement material that was in the EIR that we felt was inadequate. A lot of the report that the Commission issued, our Downtown Plan, paid a lot of attention to the shapes and forms of buildings against the skyline. We are very aware that a lot of attention for architectural detailing, for chamfering, cutting back, et cetera, is an intention partially, I think -- it's implied and not stated -- to try and also mitigate against the impact that tall buildings do have in the streets.

H.2 H.4.1 H.4.2

I disappointed that the EIR didn't really look at many of the districts that actually will have the very densest buildings. If we walk carefully through the illustrations that I have, we looked at three streets. Second Street. Walking through Second Street, if you'll notice on the Plan, there has been an attempt to guarantee sunlight down to the street, and the right-hand side, or the west side of the street, has a 200-foot height limit. But the other side of the street is taller. The drawings indicate that tall towers will march down the left-hand side of the street, and although we may have sunlight in the afternoon, there is certainly an increased sense of density, if not a certain amount of claustrophobia, if -- and I want to qualify this -- if the upper portions of the buildings are not stepping back in some way to bring more sunlight or daylight to the street in the mornings.

H.2 H.4.1

If we look at Howard Street, which is the fourth drawing, right now Howard is predominantly low-rise buildings. We're standing at YBC. Five years from now, a tall residential building goes up on the corner, perhaps another opportunity site behind it, an office building. A couple more are clustered at the other end of Howard, down near the bus terminal. **H.2 H.4.1**

In another five to fifteen years, the buildings spill in pretty much all the way down Howard. The one breathing space you see on the left-hand side of the street is the one landmark that has been saved. The rest of the street, for a couple of blocks, will have buildings that climb up to heights as high as 450 feet. **H.2 H.4.1**

Mission Street is probably the most alarming. And I should say, by the way, that I feel that probably another eight to ten of these studies should really be done to test what we might call the "maximum buildout scenario." Mission from Second, looking to the Transbay Bus Terminal, is very bright and airy now. If Philip Johnson built a building five years from now, as he's proposing for Times Square, New York, it might look like this on the corner. Low and behold, because this is predominantly a 450- to a 500-foot height district, we could potentially get the last drawing in the package. **H.2 H.4.1**

Now, this is not to suggest that I think that the architecture of these buildings will necessarily look like this. But I am only taking information that is in our own EIR that I find very alarming. The EIR states that, in fact, it is quite possible that we could have FAR's as high as 30-to-one in a C-3-0 District South of Market and 25-to-one in a C-3-0 Special District, and as high as 23-to-one North of Market. H.4.1

Now, the reason I am raising that is, I think of all things that we can imagine have an environmental impact, density, if improperly handled in terms of its bulk, has an incredible impact on over, what, seven or 800,000 people a day coming into and leaving our downtown. It is this question of perceptual density -- and I want to point out that it has two components. Certainly, dense buildings are hard to hide. But a certain height is not necessarily the only factor. Many people romanticize some of the old historic skyscrapers in our own city or in New York. Possibly they don't seem so dense and seem very attractive because they're spaced widely apart or because the upper portions of the buildings are set very far back from the street. What does 30-to-one mean? 30-to-one is the Empire State Building, but the Empire State

Building is not a particularly oppressive building. It's very tall, but it doesn't occupy a lot of its site, and most of the buildings around it are low. H.4.1

On the other hand, I will tell you a little anecdote. I was riding in a bus the other day. Two women, who were tourists to this City, were remarking as they went down the street on the 15 Third as we got to the Transamerica Building, "Gladys, hey look. That is the Transamerica Building. They sloped the sides to bring more sun to the streets. Look! The taller buildings on other side of the street look like a wall." Z.1

Now, many of you know I probably wished I had written that copy. The point is, the taller buildings on other side of Montgomery aren't taller, but because they're rising sheer from the street and they're bunched up together, people perceive their density to be greater, even though they're no denser than the Transamerica Building. H.4.1

I am not advocating pyramids. But the point is that if we use a TDR system and we allow bulk to be deposited and fill up some of the shapes that are allowable under the bulk regulations of the Downtown Plan, we are setting ourselves up for an incredible series of conflicts, which, unfortuately, the

Department and the Commission will have to arbitrate and wish that Solomon were brought back to life. We may be asked to save landmarks to give away the very openness that South of Market streets have right now, or sense of openness. H.2

It's more than just sunlight in the streets. It's like being in a canyon where at least the upper portions somehow got eroded back and you have a sense of the sky. I think one of the things that is important here is that without weakening the TDR system, the EIR should definitely look at how we are going to control the bulk when it lands somewhere South of Market. H.2

What does 30-to-one mean? We may have a few buildings like that. We have about -- if the average, by the way -- is to be 20.3-to-one on South of Market opportunity sites, I counted only nine buildings in our entire City that exceed 23-to-one, and many of them are in districts that have low buildings around them, and I won't read them off, but they're in your Space for Commerce Table in the Downtown Plan. H.4.1

Many of these buildings will not only be 550 feet tall and adjacent to one another without any parks between them, because the parks are somewhere else also, but they will be over a million square feet.

Now, that is not in the downtown EIR either, but we know, from word we have from within the development community, that some of these buildings will be in excess of a million square feet. And a million square feet of a building 550 feet tall, set only 15 feet back from its neighbor at a height of about 300 feet and then tapering a little further away, is a very big thing to hide. **H.4.1**

I think that architects are very skilled in this country in pulling off wonderful ways of dealing with the issue of density. But I think that there are several things that the EIR should really have looked at. The Plan, from the time we first saw it to the time that the Zoning Ordinance came out, eliminated the setback requirements -- that is, that the upper portions need to be set back from the base. **H.4.1**

In summary, the EIR should really have looked at alternative ways that we could control density and that we could try and resolve some of the problematic conflicts that we have. A good step in the right direction is that the Planning Department did ask for wind studies on buildings. Actually, setbacks not only make streets feel wider, they mitigate against wind. **H.3.2** **H.4.1**

I happen to disagree on almost every front with certain architects I have talked to, both aesthetically and in terms of density, but seem to have a funny common agreement with people like Jeff Heller, who advocates performance criteria. What that means is: We don't say, "Go up, set back, chamfer 15 feet here, 30 feet there," but what we say is, "We want buildings to perform so that they deliver a certain minimum protection from the wind at the street and that there is a certain sense of openness at the sky." It's called luminosity. It means we can actually measure the daylight we feel when we walk down a street. This goes all the way back to the origins of zoning. The sky exposure planes in New York take their word from trying to keep the sky open. **H.2 H.3.1**

Let's not turn the clock back. Let's turn it forward. We have the opportunity to be the first city to institute performance zoning criteria. Now, what does this mean? It means some architects and developers are going to find out that despite the fact that they have a site that says 550 feet and they follow all your design formulas, they're going to have to cut a little more and shape a little more, and it's not going to work as theoretically it seemed to. On the other hand, other sites might be perfectly **H.2 H.3** buildable.

I think this is the way to reconcile this inherent contradiction which you will be faced with, having to trade off sun on our parks, wind on our streets, the openness of South of Market streets, for architectural design. I should hope that architectural design and architectural designers look at this as an opportunity to respond to the environment when they design their buildings. H.3

An Environmental Impact Study should have looked at this and should have looked at different ways that we can mitigate against these extreme densities. H.4.1

In closing, those densities, by the way, will be greater than the greatest dense environment that now exists in mid-town Manhattan, which is where the IBM, AT&T and other buildings have gone up in recent years. The density there, by the way, is only 13.6-to-one. So when we hear of "30-to-one," we are a little alarmed. H.4.1

I urge you to look at alternative methods for dealing with bulk. I recommend that significant further reductions in base FAR's will be of assistance, and I would be willing -- and the architects I have been working with would certainly be willing to work further with the Department to share some of our views. H.4.1

Thank you.

MR. DAVID JONES: Good evening. I'm David Jones. I'd like to thank you for this opportunity to

received April 26, 1984
at public hearing

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DEPT. OF CITY PLANNING

Downtown View Analysis

April 26, 1984

DOWNTOWN VIEW ANALYSIS

Pedestrian Views of Selected Downtown Streets

The summary and drawings are excerpted from a longer study in progress. Individual Architects contributed their time and skills to this project— the following participants hope to make their more detailed report and analysis available for the Planning Department and interested Citizens

Prepared by

Anthony Bernheim
Irving Gonzales
Lindsey Jang
Thomas Jones
Arnold Lerner
Steven Suzuki

PEDESTRIAN VIEWS OF SELECTED DOWNTOWN STREETS

The accompanying drawings were made from slides of existing conditions of Streets in the South of Market Area of Downtown San Francisco. The Downtown Plan proposes allowing very high densities as a result of the use of Transfer of Development Rights, whereby the Tower regulations will be the only control over acheivable density. The E.I.R. admits that in some areas of the South of Market, buildings may become as dense as 30:1 F.A.R., which is twice the density of our most dense blocks today. Such density will have a great impact on the local street environment, which has not been illustrated in the E.I.R. We are therefore submitting our own analysis of the configuration of developments on Mission, Howard, and Second Streets which might follow the proposed height and bulk regulations of the Downtown Plan. The architectural styles will vary, although the study uses designs for buildings similar to those proposed for San Francisco and other cities by the Architects who design many projects in this city. **H.2 H.4.1**

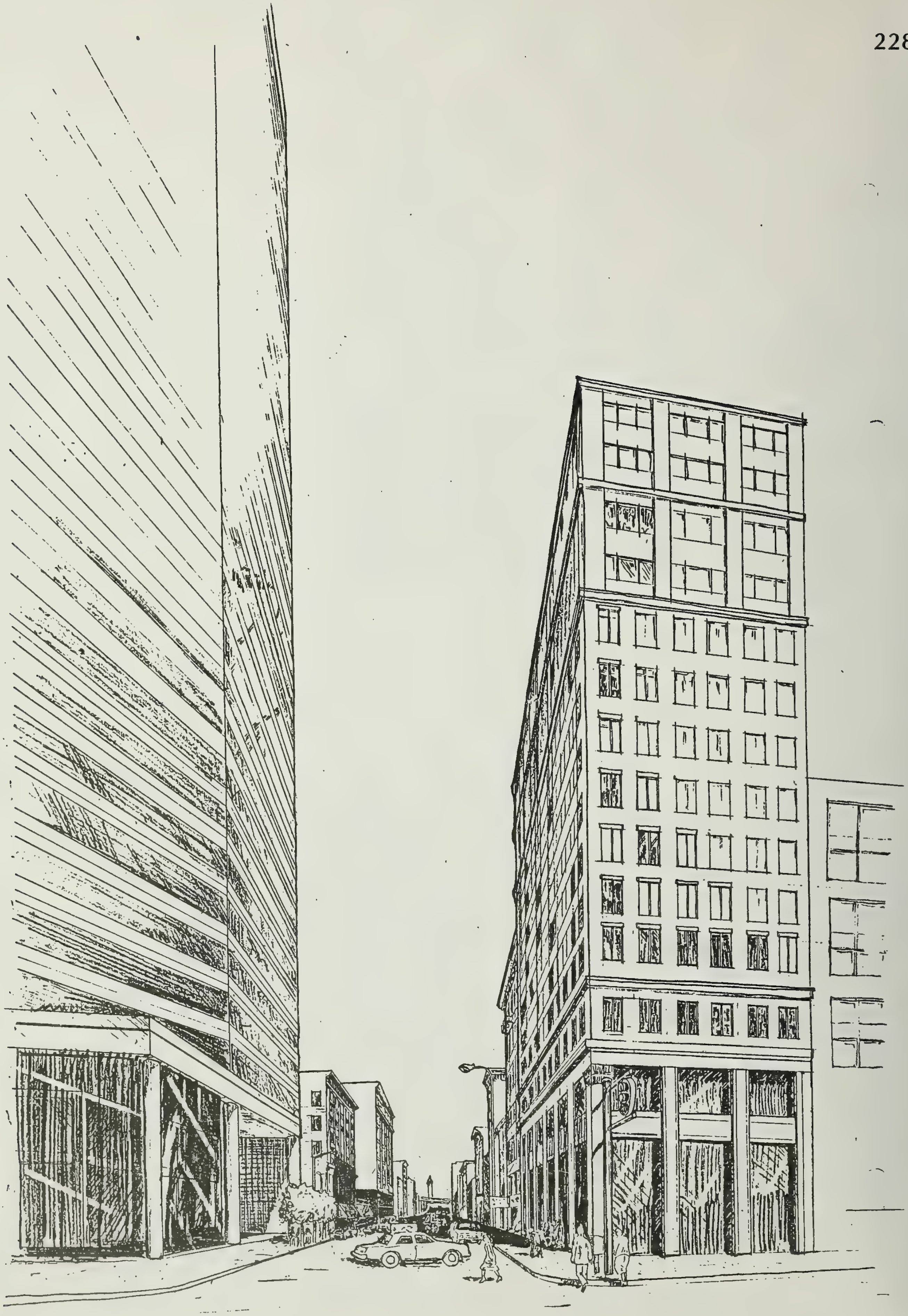
The illustrations are intended to show how dense the environment will become with a full use of TDR s on buildable sites, and without any cap on density. They also indicate how buildings will affect the degree of sky that will remain visible if no setbacks occur at the tower portions of the building. Setbacks can accomplish two important goals, First, they can help mitigate the wind problem created when shear vertical building faces rise uninterrupted from the streets. Second, they create a greater openess against the sky, and actually allow more daylight into the streets even when there is no direct sun.

H.2 H.3.1 H.3.2 H.4.1

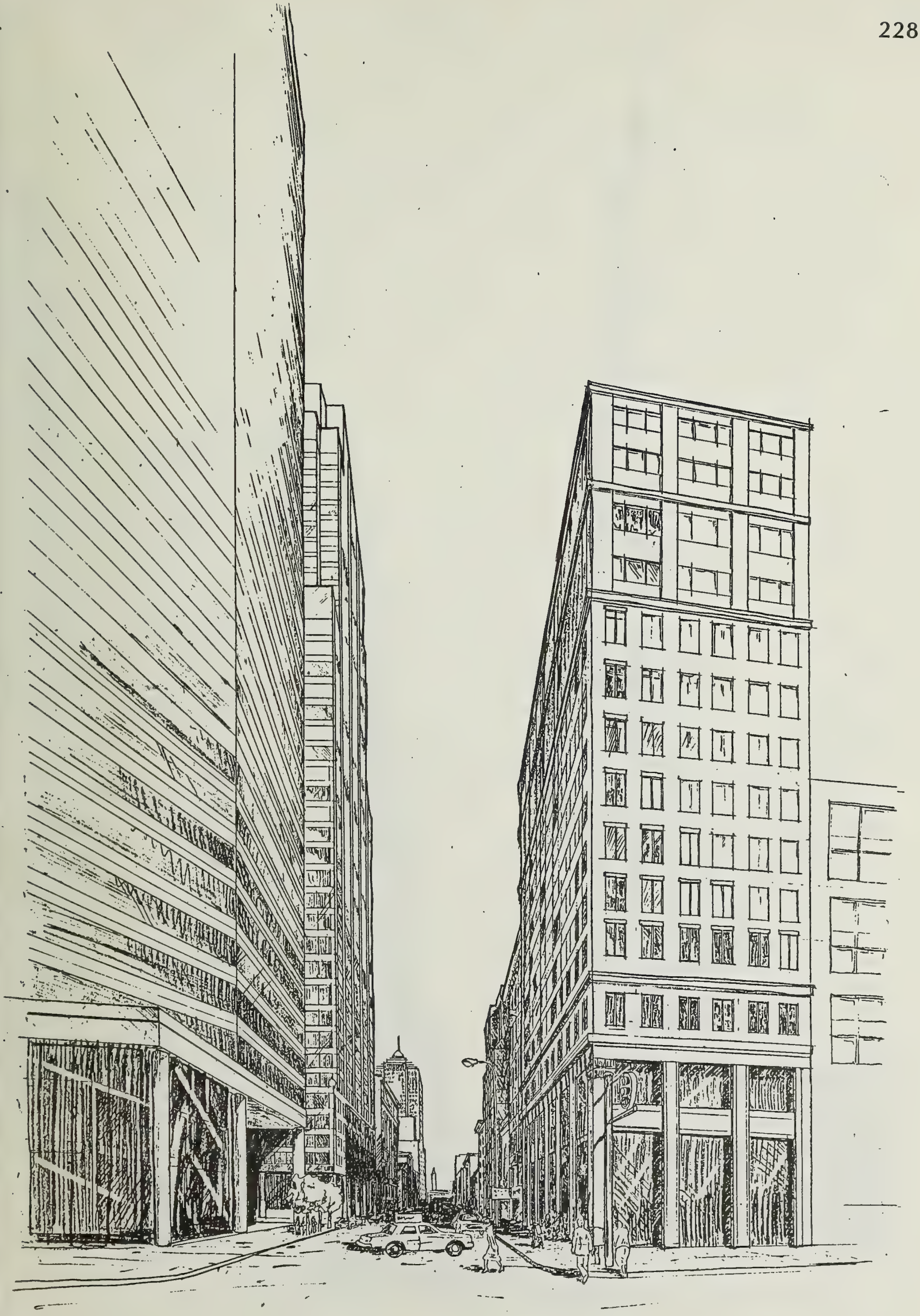
The view studies indicate that visually, as well as environmentally, the density and bulk acheivable under the Downtown Plan is extreme for this city. Without mandatory building setbacks, some form of performance standards based on comfort (sun and wind) and perception (sky exposure or luminosity) should be required, especially if there is to be no cap on density. Such performance criteria would allow the architect to solve the environmental problems created by tall buildings in a flexible and creative manner. In lieu of mandatory dimensional requirements for setbacks, such performance criteria would actually be more sensitive to local conditions, and would encourage innovation. However, performance criteria may not make all sites equally capable of realizing their "maximum theoretical buildout." The EIR should have looked more closely at the environmental impact of buildings where most of us perceive them...in the streets. Scenarios that indicate alternate building configurations based on setbacks, based on wind criteria, and based on luminosity (such as the Midtown Manhattan zoning for daylight) should be illustrated for all areas slated for heights of 300 feet or more. **H.2 H.3 H.4.1**

The performance criteria is suggested already by the use of wind studies, although the EIR fails to examine what will occur if the Commission does wave the wind criteria as the Downtown Plan would allow in some cases. **H.3.2**

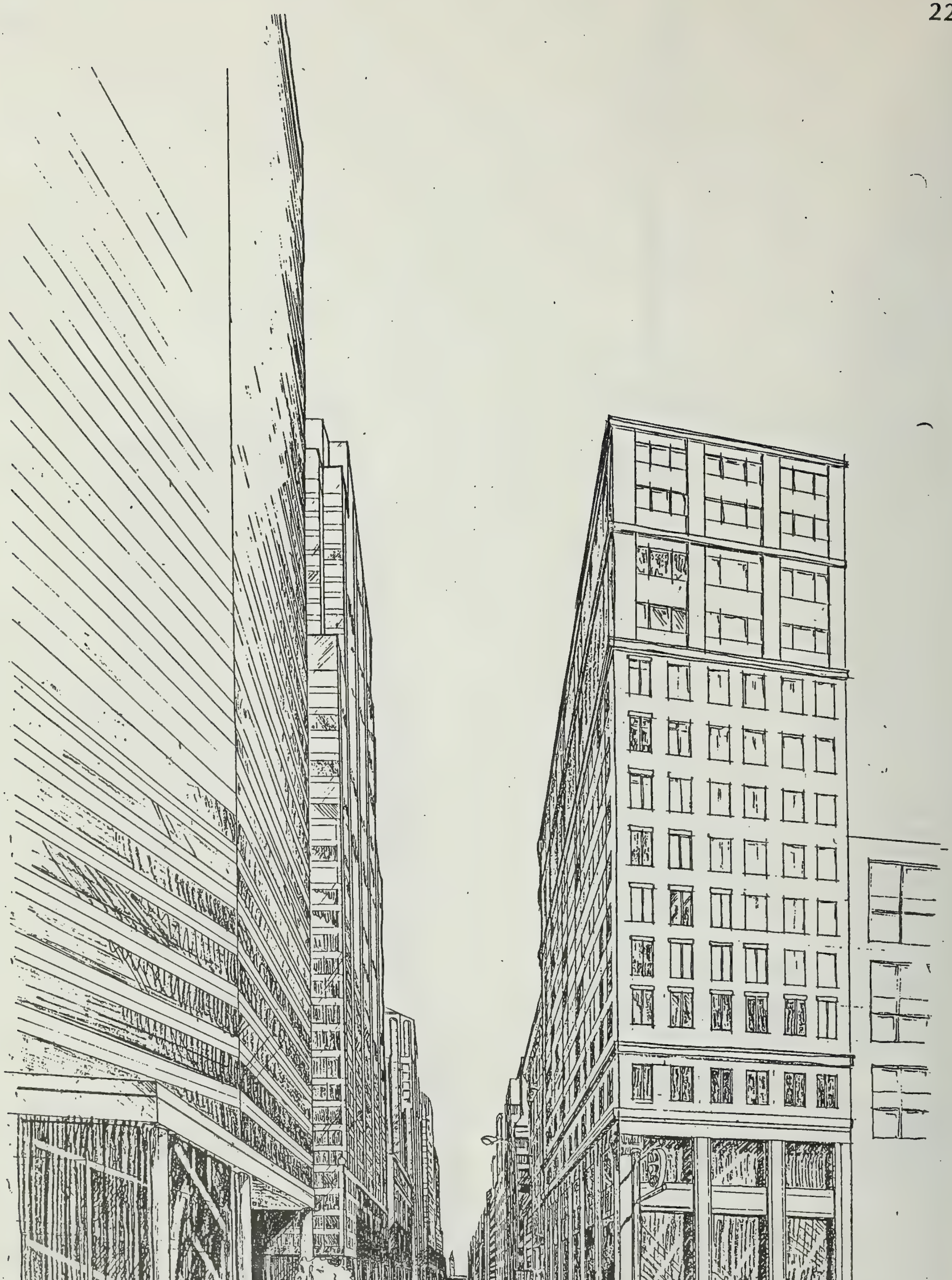
The development of equitable criteria based on local conditions and expectations is not suggested by the Downtown Plan in total. Too many exceptions are possible and the factors being traded off (saving Landmarks, protecting sun on parks, encouraging development South of Market) are often going to be in conflict or competition. The downtown EIR should identify areas where the Plan has not fully identified or resolved the conflicts and should identify priorities or mitigation measures so that the environment of the streets is not sacrificed unknowingly or unnecessarily in the name of "good design". **H.3**



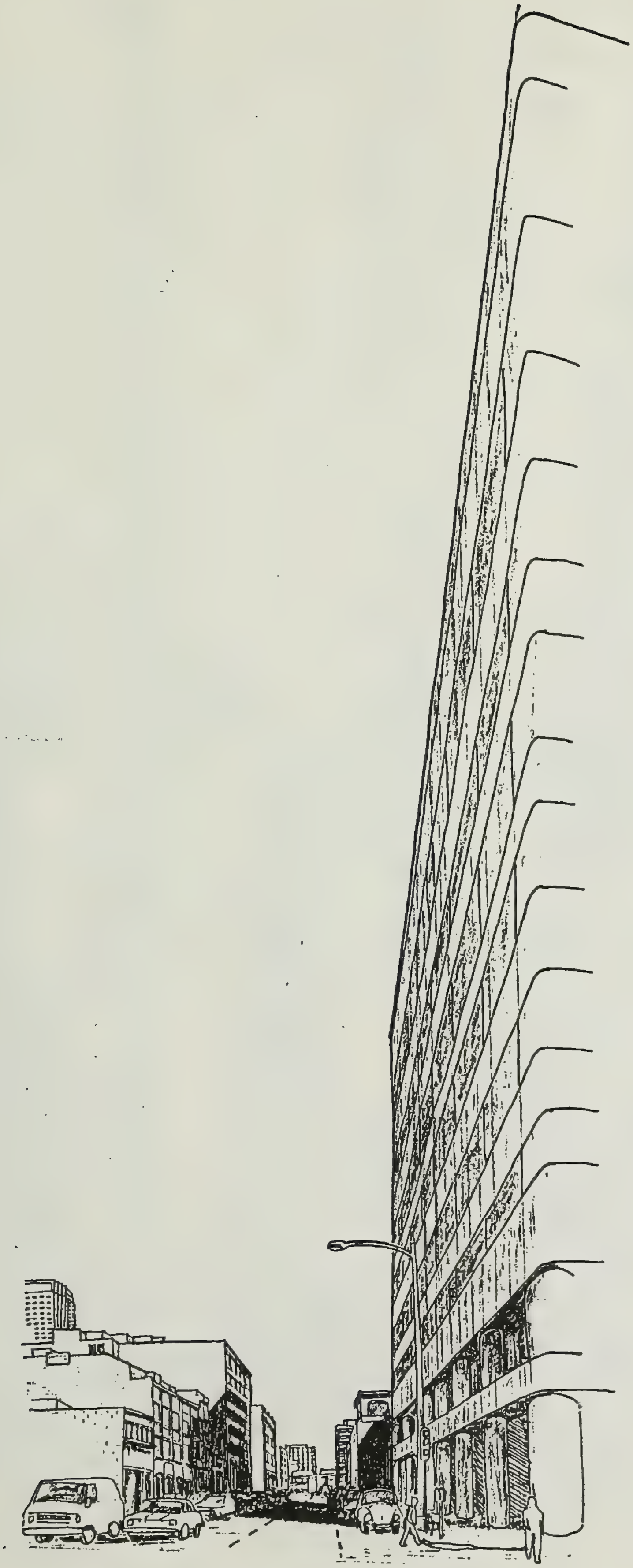
SECOND STREET: Looking South from Market Street, Currently



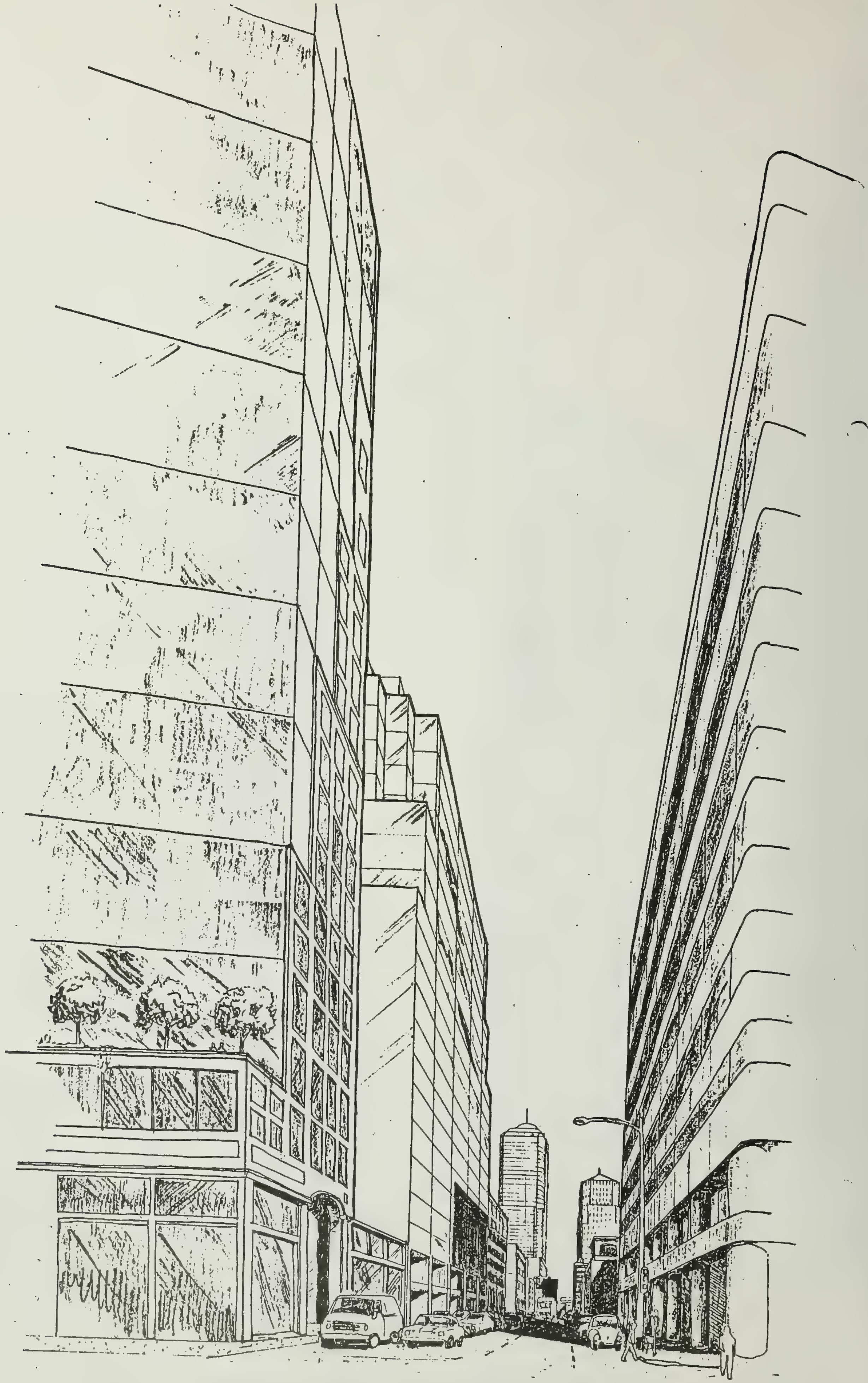
SECOND STREET: Looking South from Market Street, 5 Years



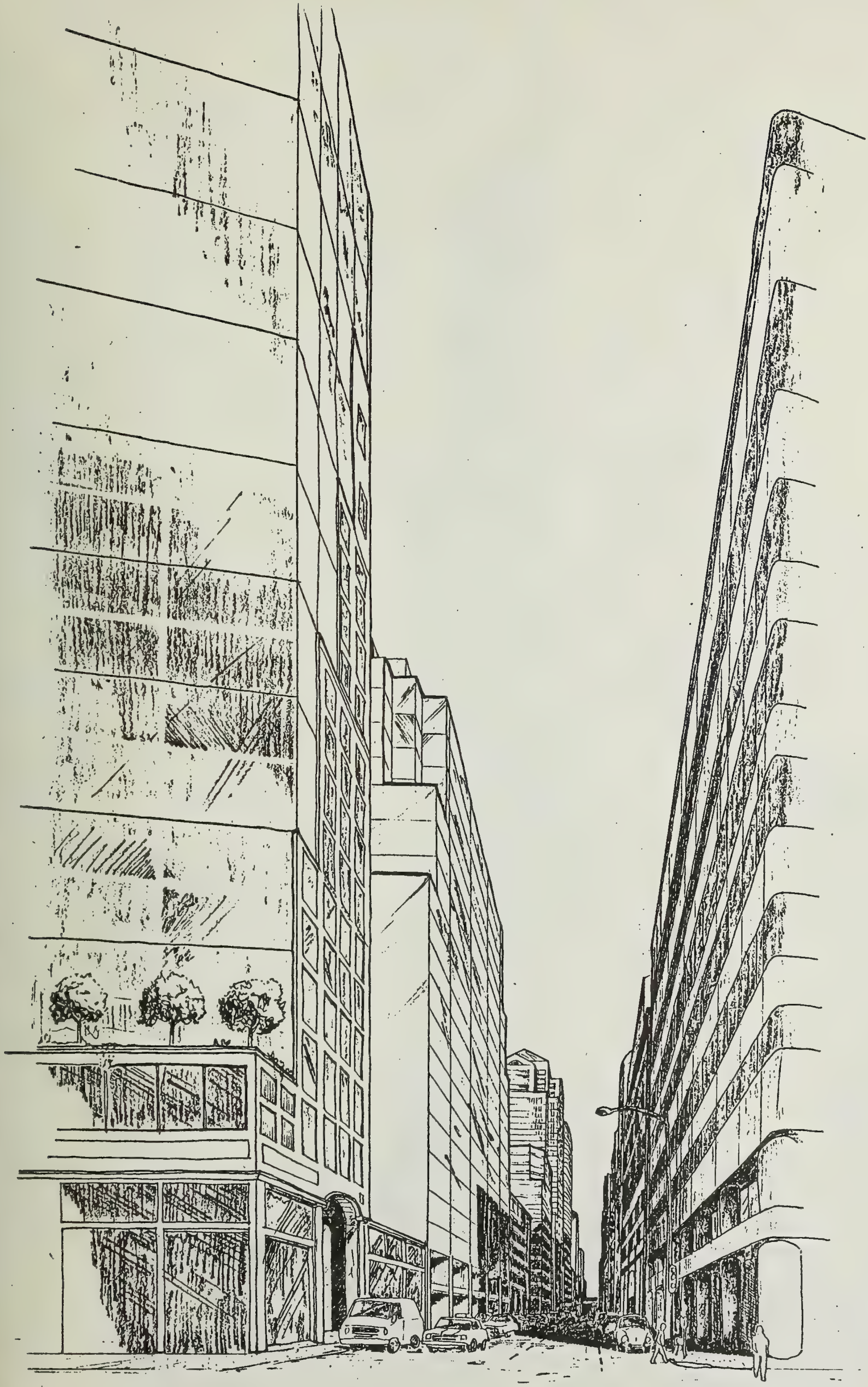
SECOND STREET: Looking South from Market Street, Maximum Build-Out



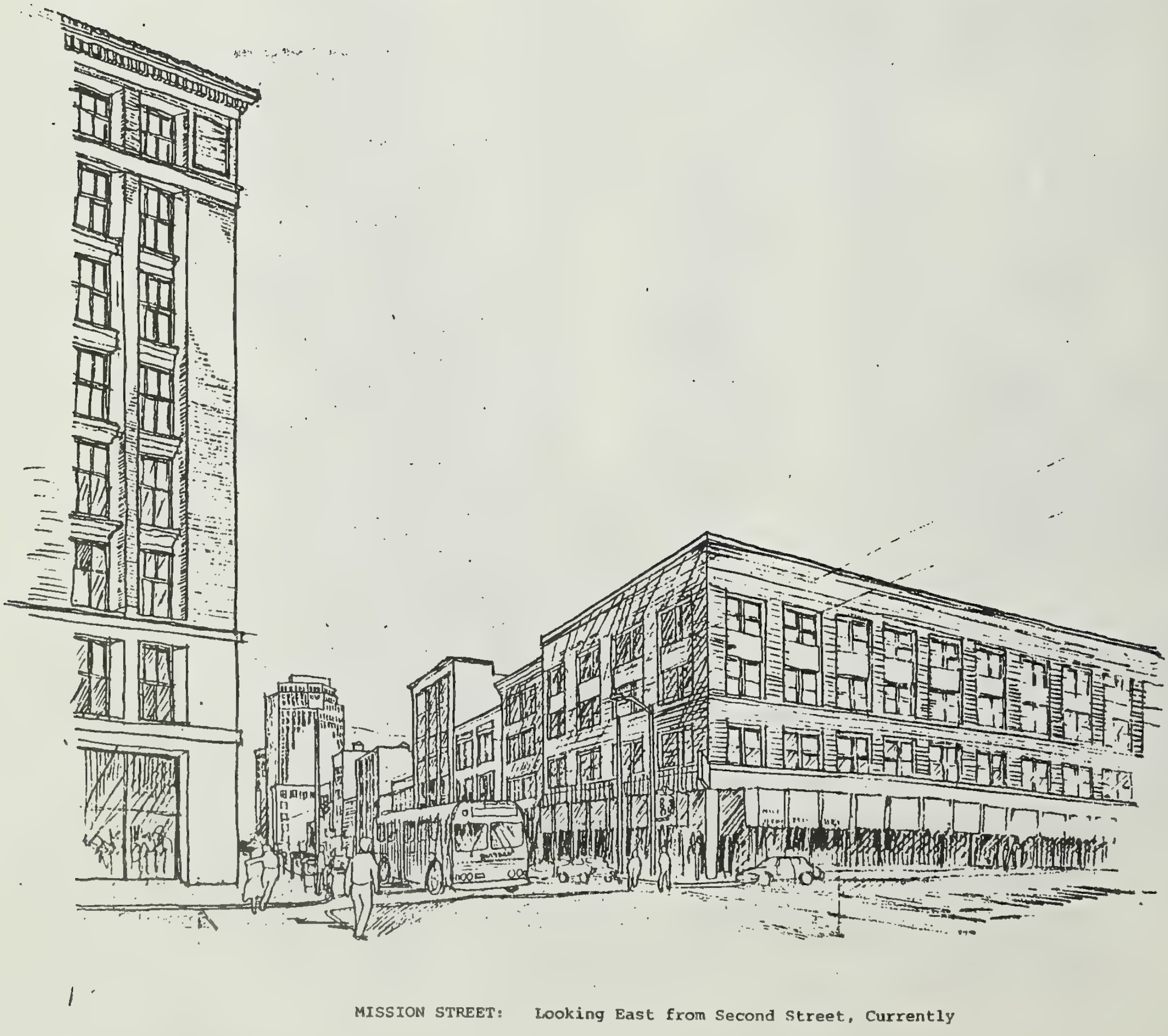
HOWARD STREET: Looking East from Third Street, Currently



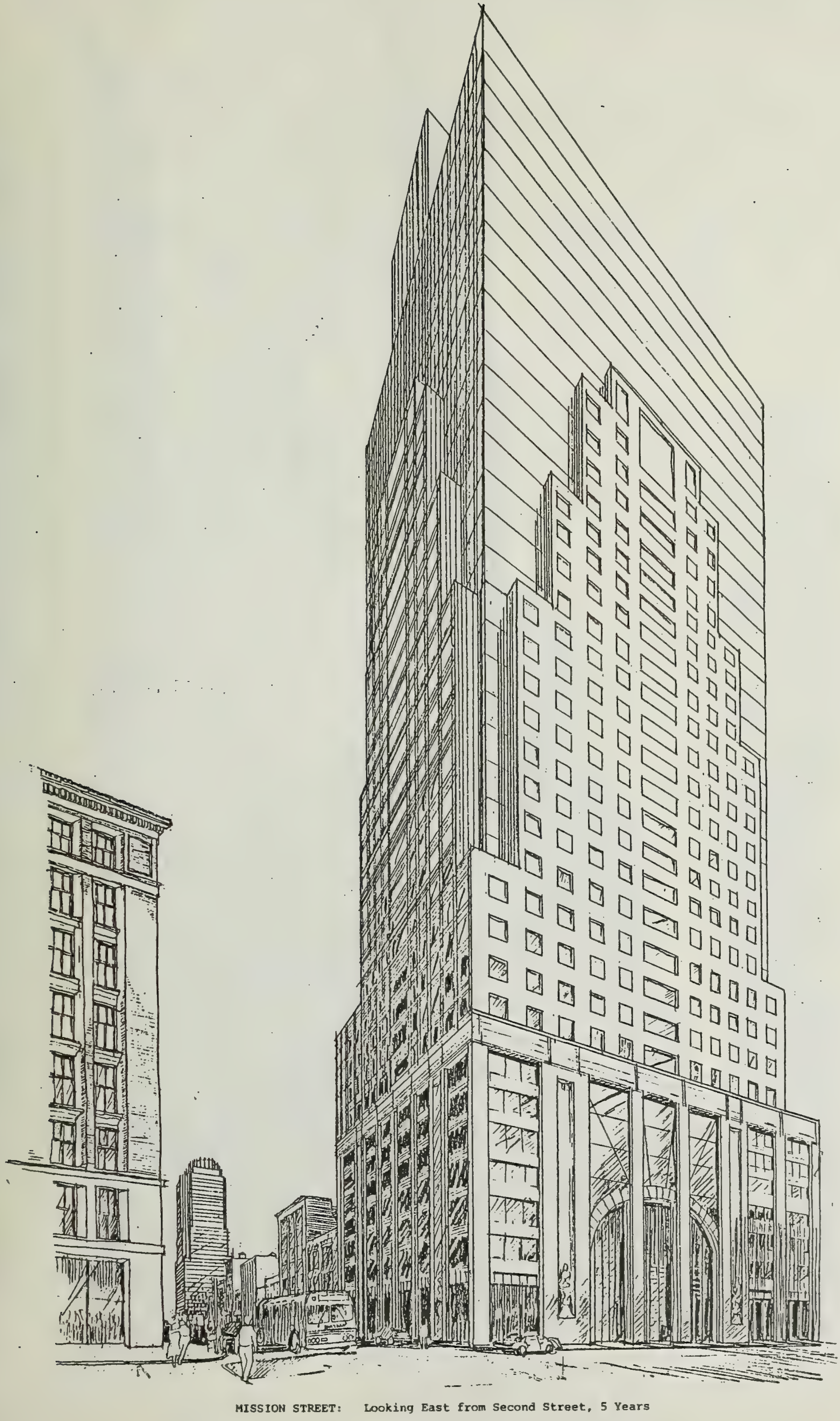
HOWARD STREET: Looking East from Third Street, 5 Years



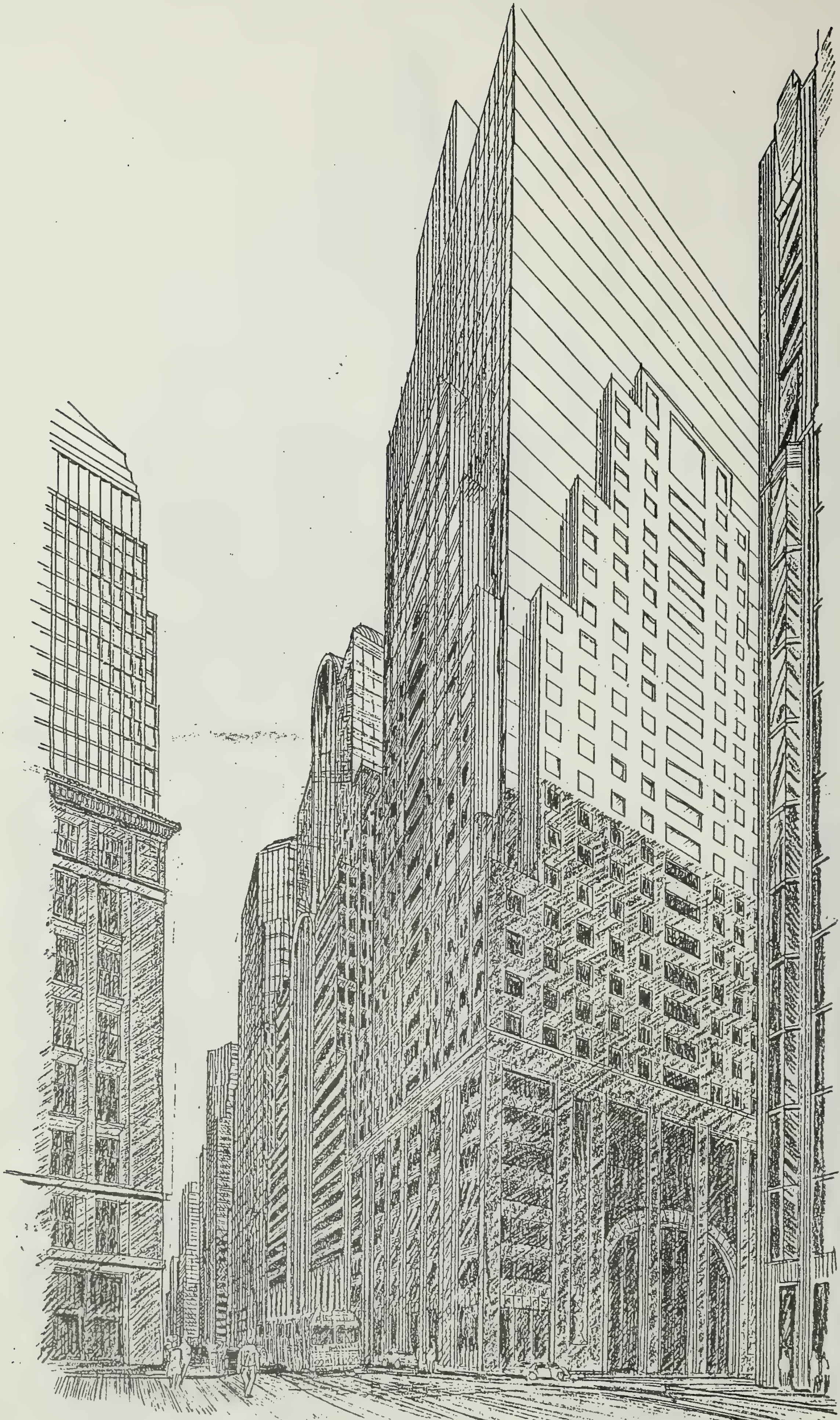
HOWARD STREET: Looking East from Third Street, Maximum Build-Out



MISSION STREET: Looking East from Second Street, Currently



MISSION STREET: Looking East from Second Street, 5 Years



MISSION STREET: Looking East from Second Street, Maximum Build-Out testify. Z.1

The testimony today reminds me a bit of Marlon Brando and "On the Waterfront." In the movie, he could have been a championship prize fighter. But on the advice of his brother, he sold himself cheap. He threw some fights and ended up with nothing to show for his talent. Z.1

At the end of the movie, he turned to his brother and said, "You are my brudda. You were supposed to take care of me. I could a' been a contenda, but I'm a bum." Z.1

Well, that is how I feel today, and I think that is what the people here are saying: You are the Planning Commission; you are supposed to take care of us. You are supposed to take care of San Francisco residents. Instead of that, you're selling the City cheap. We are getting a few trinkets back out of what we give to developers, and we are losing the attributes that make this City great. Z.1

I am going to focus my testimony on traffic and transit, especially Muni. I have been looking forward to this EIR for a long time. I have been looking forward to it with hope that the Planning Commission would take care of me, would take care of San Francisco residents, and I wouldn't have to come down here any more. I was hopeful because the EIR process can be used as a vehicle around which diverse interests can reconcile different viewpoints and make the compromises necessary to allow new development to occur. Z.1

The key to this process of reaching consensus is to provide accurate, adequate, and objective information which can sustain public scrutiny. The Department of City Planning said during the scoping process for this EIR, "They'll attempt to use the Downtown Plan as a vehicle to reach this consensus." I have been personally hopeful that as a result of this plan, community groups could get more controlled growth, better mitigation, and developers would be willing to contribute more because they would get a simplified process -- no more lawsuits, no more fights, no more building-by-building battles. S.1.1

However, this EIR makes me very frustrated and very angry. My fantasy of peaceful coexistence has been set back. This EIR is bulky, unwieldy, unresponsive to scoping comments, and presents facts in a selective and prejudicial manner. The facts it presents are misleading and distorted. And given that it is five inches thick, it's amazing what has been omitted. S.1.1 S.1.2 S.2

The EIR as currently written is an invitation to years of litigation, ballot initiatives, continued building-by-building fights, delays, and lawsuits. However, this is only a draft. I am still hopeful that the Planning Commission will use the hearing process to correct those deficiencies, use that process to get a consensus; we'll get a meaningful document, and then I can go home and read great literature rather than EIR's. **S.1.1 S.1.2 S.2**

I'd like to pass out just one page of my comments. I will be submitting much bulkier and lengthier written testimony. What worries me on the transit basically is the accuracy, adequacy and objectiveness of the information. And I will be asking a lot of questions in writing, but it really boils down to one fact: I really don't believe the numbers. **S.2**

If you look at Table 1, we have the passengers per seat ratios in 1981 and '82 and in 1984 out of the Downtown EIR. And I've added columns for how many people on a bus and, therefore, how many technically are standees. It's done by corridors, but you'll notice that in '81, if you are going to the Northeast, you have an average of three people standing around you. If you are going to the Northwest, you have an average of eight people standing on that bus. In the

Southwest, 16 people. And, on the average, on a Muni Metro, 23 people. **E.2.2**

Now, in discussions with Muni and in the EIR, it says that that bus that's crowded isn't really totally typical because it's compensated by the bus with less people, and this is the average over two hours. I have been taking an informal poll at work. And from what I can tell, no one has ever hit that magic bus that is bringing down the average. **E.2.2**

Today on the KLM on the way here, I left Embarcadero at 5:30, there were 18 people standing before it left. There were 54 people standing by Montgomery Street. There were 88 people standing by Powell. There were 101 people on it when I got off at the Civic Center. **E.2.2**

Now technically, I guess, there are magic KLM's that have no people on them that average the numbers in the EIR, but I haven't seen them. And I think it's statistically improbable that the people I ask at work -- every day I ask them to do counts -- have never found one. That leads me to doubt the figures. **E.2.2**

And I would just basically want to know: Are these based on theoretical schedules? Are they based on line counts? The EIR doesn't say. **E.2.2**

If you'll notice Table 2, the previous Department of City Planning Guidelines which were used for transit showed that transit, like KLM, was at 60 percent, 96 percent of capacity, in 1981-82. This Commission in September of '83 came out with new guidelines. They showed almost every line having more capacity and less overcrowding. This EIR says things got a lot worse in '81 to '84. The guidelines the Planning Department is right now using for specific EIR's said they got a lot better. **E.2.2.2**

We got a letter back on a request to Muni from Harold Geissenheimer that said, quote, "On the whole, we consider our peak period downtown services, and specifically the 38, 38 L, 38 X, BX to be operating at and above capacity load conditions." **E.2.2.2**

I just don't see how that information jibes with either the September '83 Guidelines or the EIR's. And when I start getting three or four documents that all tell me different things -- some transit is getting worse, some is getting better, I would like to see the basis for this. I will be submitting a lot of questions, asking about that. **E.2.2.2**

I am very disappointed on the transit proposals and what they would cost. As you know, this is what I call one of the big omissions. For the past five years, the cost of transit improvements has been just an incredible discussion in this City. There has been the one-time fee -- every EIR hearing. There has been the Assessment District. There have been studies by the Chamber. There are the studies by SFRG.

E.2.1.2 E.6.2.1 E.2.7

When the Downtown Plan came out, I said that transit proposals cost $3.3 million. Suzy Bierman **E.2.1.2** asked Dean Macris, "What's your response?"

Dean Macris said, "It will be in the EIR." **E.2.1.2**

This is an EIR showing economic, social and environmental impacts. Not one word on how much the transit will cost -- after four years of this debate. An incredible omission in a five-inch thick document.

E.1.4.1 E.2.1.2 E.2.7 E.6

But the mind-blower to me that's biggest is that the consultants who did the traffic were different than the consultants that did Muni. And I am going to read a direct quote, because it's pretty good. This is from Traffic, and there are about ten of them like this: "The increasing levels of congestion on surface streets would extend to the peak period, as shown by Figure 4 E 3. Muni operations would be affected by increasing levels of street congestion. Surface transit operations will be slow, which would have the effect of increasing the frequency of crushed loadage on individual vehicles. Peak hour conditions would be extended and would be expected to deteriorate at all intersections by 2000. Expanded areas of traffic congestion would disrupt surface Muni operations." **E.1.1 E.2.2.3**

There are about ten quotes like that. I took two. **Z.1**

If you look at the consultant's report to the downtown EIR in the Transit Section, technically we're going to have 67 new Muni coaches by 1990; 150 new Muni coaches by 2000. That is going to take care of the transit problem. The traffic consultants say the existing buses won't even be able to make it through intersections, let alone new buses. **E.1.1 E.2.2.3**

So I think we have a real conflict that has to be resolved, and I will be submitting a lot of questions on that. **Z.1**

I think Dale raised a very good point about the neighborhoods and traffic through them. The Downtown EIR shows that some of the highways, like 101, won't feel as much pressure as you'd anticipate because -- and this is about the 280 intersection with 101 -- "Although this interchange is the major capacity restraint for the freeway system inside San Francisco, conditions have been analyzed at the county line because of the abundance of surface routes in San Francisco that will allow traffic in downtown to bypass

101 and 280."

E.3.2

So basically, things aren't going to be that bad because people are going to use city streets. When you look at the analysis of what's going to happen to city streets, it's just not there. Again, initiatives, discussion, newspapers -- what's happening in our City streets is a big issue. And a $250,000 or a $750,000 study that thick (indicating), somehow it hasn't got across. But that is an issue in the City. E.3.2

I guess what I am asking for is that the Planning Commission take care of us. It's not my job to come down and ask the Planning Commission to plan. And we do it all the time. We are living off the capacity that was built in the Thirties and planned in the Fifties. The bridges were built in the Thirties. They had oodles of capacity. BART was planned in the Fifties. And Muni Metro Underground was planned in the Fifties.

Z.1

All those things came on line in the Seventies, so you could approve buildings in '74, '75, '76 -- and they'd just use a little more capacity on the bridge and, well, the problem was a little worse, but no one noticed it. E.2.1 Z.1

All of a sudden, in the last three years, incredibly long lines on the highways, incredibly long lines on the toll plaza. There is no capacity left. You guys got away with murder the way you approved buildings in the Seventies. Somebody who died in the Thirties, built the bridge, allowed you to get away with that. No one has done the planning for the things being approved right now. The capacity isn't there. **E.3.1 E.1.7**

When people get in their cars and feel really angry, that really affects their attitude about life and how they feel when they go home and the energy they have to do other things. When you're in a traffic jam and you get intolerable delays, or you're in a bus and it becomes a humiliating experience, it affects the way you feel about yourself, your family and your life. **E.1.4.2 Z.1**

When you become angry or tired, your attitude about life changes. It affects your relationships, it affects your health, affects your attitude about society. People feel trapped and helpless. That is what the traffic and transit conditions are doing. **E.1.4.2 Z.1**

People are looking for someone to blame. Unfortunately, they take it out on someone close to them. It never occurs to them that the problem is simply bad planning. And I hope the Planning Commission will revise this document and do its job. You are supposed to look after us. You are supposed to take care of us. **E.1.7 Z.1**

PRESIDENT ROSENBLATT: Stuart Flashman.

MR. FLASHMAN: My name is Stuart Flashman. I live in Emeryville, California. I serve on the Mayor's Special Committee on Redevelopment for the City of Emeryville. And I am testifying here tonight because I have some concerns about the impact of the Downtown Plan on Emeryville. Even though Emeryville is not a part of San Francisco, nevertheless, we are one of your closest neighborhoods. And it's one of these things where when San Francisco sneezes, Emeryville gets pneumonia. **Z.1 B.2**

I am concerned in part because, as part of the Mayor's Special Committee on Redevelopment, we are dealing with issues about redevelopment in Emeryville. And part of my concern in terms of looking at the EIR for the Downtown Plan in San Francisco is that I see issues that we are having to deal with in Emeryville, and I don't see them getting discussed in the Downtown Plan for San Francisco. **B.2 E.2.1 E.3.1 Z.1**

And if a city of four thousand people can discuss some of these impacts, I don't see why a city the size of San Francisco can't consider some of these impacts. **B.2 E.2.1 E.3.1 Z.1**

The major concern I have is that the EIR doesn't at all discuss the issue of how much growth should be allowed in San Francisco. Is there any limit as to how much development San Francisco can reasonably stand? Particularly in terms of housing -- and particular in housing, affordable housing -- in terms of transportation, and in terms of open space.

B.1 B.2 B.6 D.3.1 D.3.3 D.4

I don't see any discussion about any upper limit in growth in San Francisco in any of these aspects. More importantly, in terms of Emeryville, I don't see much of any discussion about what impact the development envisioned by the Downtown Plan will have on the other communities in the East Bay and otherwise in the Bay Area. **B.2.1 B.2.2 D.3.2.1 D.3.2.3 E.2 E.3.1 N.3**

Let me get into a couple of specifics as to what my concerns are in terms of Emeryville. Emeryville has been lucky to maintain a stock of affordable housing. The pressure from San Francisco is already affecting rents in Emeryville. We have seen rents in Emeryville going up to the point where now people are starting to talk about having to institute rent control in Emeryville, what has never been a need before.

D.3.2.3

The Downdown Plan in San Francisco will put increased pressure on Emeryville's housing market in two ways. One, because it will be bring more residents into the area for the new white collar jobs, and, secondly --

D.3.2.3

PRESIDENT ROSENBLATT: Excuse me. Mr. Flashman, could you pause for a few minutes? We need to take a short break, and then you can continue your testimony.

[Short recess]

PRESIDENT ROSENBLATT: All right, Mr. Flashman. I want to thank you for your indulgence. Woud you please continue from where you where speaking before.

MR. FLASHMAN: Yes. Again, as I was talking about, in terms of housing, the pressure from San Francisco already is affecting rents in Emeryville.

D.3.2.3

I mentioned that one of the effects would be because of the new residents being brought in by the increasing development in downtown San Francisco. In addition, the fact that all of these additional residents are being brought into San Francisco is going to displace residents out of San Francico as the rents in San Francisco continue to escalate. And these blue collar workers whose housing and whose jobs are going to be displaced out of San Francisco by the Downtown Plan are going to end up being forced over into the East Bay, putting additional pressure on the East Bay housing markets.

D.3.2.1 D.3.2.3

I don't see anything in the EIR discussing the impact these changes will have on the East Bay. I mean, admittedly they may not, when you throw your blue collar workers out of San Francisco and they end up living in the East Bay, that maybe doesn't impact on San Francisco, but it impacts on the East Bay. And an EIR, so far as I know, is not supposed to have its geographic limits defined by the city borders of San Francisco. **D.3.2.1 D.3.2.3 D.3.2.4**

In terms of traffic, which is my second major area of concern, I am lucky, actually, in that I don't work in San Francisco, so I don't have to commute from Emeryville to San Francisco. I work in Richmond, so I commute in the opposite direction. So every morning and every evening, I see the traffic jam that goes along Interstate 80 towards and away from the Bay Bridge. That traffic jam, every morning, extends all the way from the approach to the Bay Bridge toll plaza out to Richmond, and every afternoon it extends from Richmond back to the Bay Bridge toll plaza. That is a distance of about nine miles of bumper-to-bumper, stop-and-go traffic that people who commute to and from San Francisco have to deal with every day. **E.3.1**

Now, admittedly right now, CalTrans is trying to struggle to alleviate the present mess, but the

Downtown Plan, as I see it, is going to increase the problems and will totally negate any attempts that CalTrans is making right now to try and make that problem manageable. And I can very easily see how people commuting from the East Bay into San Francisco are going to have three-hour commutes each way. And I don't consider that to be at all reasonable, to expect people to be commuting three hours each way to and from work. **E.1.4.2**

I know that in addition to that, one of the things that CalTrans is planning is a high-occupancy vehicle lane. That lane will, it's true, improve the situation in terms of the approaches to the Bay Bridge. It will also, however, increase the amount of traffic on the Bay Bridge. And when there is a breakdown or an accident on the Bay Bridge, it means that the traffic jams resulting will be that much worse. **E.3.1 E.3.3**

I have already dealt with traffic jams, going across the Bay Bridge, causing me to spend close to an hour and a half just getting across the Bay Bridge, just the actual span of the bridge. **E.3.1**

The third area I want to comment on is on transit. **Z.1**

PRESIDENT ROSENBLATT: Mr. Flashman, are you about finished?

MR. FLASHMAN: Just about. Basically, the transit for the AC Transit across the Bay Bridge has to be sort of a joke, because with the traffic lined up for eight miles to get to the toll plaza of the Bay Bridge, I don't expect anyone is going to want to take a bus across the Bay Bridge when they have to wait through that traffic jam on that bus the full eight miles. **E.1.4.2** **E.3.1**

What I would like to suggest that the Planning Commission ought to be considering is some alternative plans -- in particular, to consider setting some maximum limits on developments, commercial developments in San Francisco on a section-by-section basis, and also setting some annual limits as to how much development goes on in each particular year so that you don't end up with the massive dislocatioins that are going on right now because of the excess development going on in San Francisco. **P.1**

PRESIDENT ROSENBLATT: The Commission has completed all of the testimony, received all of the testimony indicated. We have not taken time as yet for comments from Commissioners, and obviously there is one significant comment that was made during the testimony that I think compels us to have one more period of time when we would have a public hearing. And I would suggest that we do that, that the Commission might want to consider doing that next week.

We have a reasonably brief, by usual standards, regular business meeting next week, which I would gather would be reasonably and rather easily completed by 5:00 o'clock.

Does the Commission wish to . . .

VICE PRESIDENT NAKASHIMA: I'd like to move that next Thursday we schedule for the continuation of the hearing at 5:30, until we finish the matter.

COMMISSIONER BIERMAN: I thought you suggested 5:00.

PRESIDENT ROSENBLATT: I suggested that we probably would be comfortably through by 5:00 with the other business. Our normal business will be conducted under the Commission's new rules with respect to time limits.

COMMISSIONER BIERMAN: Why don't you make it 5:00 instead of 5:30?

VICE PRESIDENT NAKASHIMA: I'd be surprised if we got done on time. I'd like to give it a little 30-minute leeway just to play it safe.

PRESIDENT ROSENBLATT: All right. Is there a second to the motion?

COMMISSIONER BIERMAN: Second.

PRESIDENT ROSENBLATT: All those in favor? Opposed? All right. That concludes today's business.

[Whereupon, the proceedings in the above matter adjourned at 7:40 o'clock p.m.]

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STATE OF CALIFORNIA)
) ss.
COUNTY OF MARIN)

I, RICHARD S. ADAMS, do hereby certify that the foregoing transcript was reported in shorthand at the time and place therein stated. I further certify that the foregoing is a full, true and accurate transcription of the proceedings to the best of my ability.

I further certify that I am not of counsel or attorney for either or any of the parties named in said action, nor in any way interested in the outcome of the cause named in said caption.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office this 30th day of April, 1984.

Richard S Adams

RICHARD S ADAMS
FEB 17, 1987

COPY

CITY PLANNING COMMISSION

CITY AND COUNTY OF SAN FRANCISCO

Public Hearing on the Draft Environmental Impact Report for the Downtown Plan) No. 9. EE81.3

Thursday, May 3, 1984
6:02 o'clock p.m.
Room 282
City Hall
San Francisco, California

Reported by:
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Toby Rosenblatt, President

Susan Bierman

Norman Karasick

Jerome Klein

C. Mackey Salazar

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THURSDAY, MAY 3, 1984 6:02 O'CLOCK P.M.

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PRESIDENT ROSENBLATT: Ladies and gentlemen, can we reconvene, please. Let me repeat that there are sign-up cards here, and if you wish to address the Commission on this matter of the Draft EIR, we would appreciate you signing one of these cards. We would ask that people please observe the same ground rules that we adopted last hearing on this matter, which is testimony of no more than 15 minutes. And we would certainly welcome any written comment which you would like to provide the Department between now and the close of that comment period, which is the end of the working day on June 4th.

Lee, would you call Item 9, please.

SECRETARY WOODS: This is a public hearing on the Draft Environmental Impact Report for the Downtown Plan.

MR. BASH: There are some points that I'd like to make in response to last week's public hearing before we begin taking testimony on this item. First, we have a typed version of the dates involved in future Commission meetings on the Downtown Plan which is before the Commission now, I think, and we have copies here for members in the audience, if they would like.

In response to Commissioner Salazar's request concerning emergency services and seismic safety analysis, the Downtown Plan Draft EIR discussions of Fire Department and emergency services were based on extensive consultation with appropriate City departments. The Fire Department was consulted by ESA regarding the service needs in the downtown during preparation of both the consultant's report and the Draft EIR. They were not asked specifically about emergency services after an earthquake but were asked about needs for all the services, which includes response to non-fire incidents.

Contacts were mainly with Chief Robert Rhodes, who also supplied ESA with Fire Department computerized data on incidents in the various areas of downtown and in various types of buildings in downtown. Copies of draft sections of the consultant's report were provided to the Fire Department for their review before the document was published.

All City department heads were given copies of the consultant's report and were asked either by letter or in person by the Director to provide the Department with any comments they might have on material in their area of expertise.

The Mayor's Office of Emergency Services was involved in preparation of the seismic effects section of the Draft Environmental Impact Report. They provided ESA with information upon request. ESA offered draft copies of this section for that office's review and revised a section based on that office's staff comments.

Department staff also contacted Tom Jenkins of that office on matters in the seismic safety section during all our review and preparation of that section.

In addition, the Commission has been requiring for the past couple of years that developers of individual projects provide a building-specific emergency response plan in coordination with the Office of Emergency Services. This condition was developed with and approved by that office in December of '81 and has been included in project EIR's and approval actions after January '82. Thus, the impact information and mitigation measures in the Downtown Plan EIR are not coming up for the first time here, but have been dealt with on a more appropriately limited basis for the last two years in actions on individual projects.

The last point concerns the status of the downtown EIR consultant's report. As the Commission knows, the EIR Contract Monitoring Panel was established by the Commission to monitor preparation of that report under contract with Environmental Science Associates, approved by the Commission, using funds provided by the business, labor and development communities and the San Francisco Foundation. That report is not itself an EIR or a defined environmental document under the California Environmental Quality Act. Much of it, however, is used and incorporated by reference in the Downtown Plan EIR.

These were all the comments I want to make. I would be pleased to answer questions.

PRESIDENT ROSENBLATT: Thank you. We will now take testimony. I would like to ask for the sake of the court reporter that each speaker, as you come forward, please give your name and then be kind enough, even if it's a simple name, to spell it so we have it clearly on the record.

The first speaker is Marilyn Smulyan.

MS. SMULYAN: My name is Marilyn Smulyan. I am here to speak for Supervisor Nancy Walker. It's S-m-u-l-y-a-n. **Z.1**

The testimony I am going to present for Nancy today will be rather brief because she hasn't yet had a chance to complete her analysis of the Draft EIR. She does intend to submit written comments prior to the deadline, which I think is June 4th. Is that correct?

S.1.3

I believe that the major deficiency in the Draft EIR is the lack of consideration given to projects currently being proposed for areas adjacent to those included in the EIR. I do not understand how a Draft EIR can be conducted without considering the cumulative impacts of major projects which are currently being considered, such as Mission Bay, the Downtown Stadium, the completion of the Yerba Buena Center, and the area included in the South of Market moratorium. **A.4 B.1.1 B.1.2 B.2 D.2.5 E.1.5 E.1.9**

Likewise, I don't understand how the Draft EIR can ignore the overall potential impacts on the diversity of our City and our neighborhoods. I sincerely question whether or not people are going to want to come visit and live in a city that is predominantly made up of office buildings and office workers. **B.4 D.3.1**

In my capacity as a member of the Board of Supervisors, I hear many citizen complaints. The two biggest complaints I hear are related to housing and to transportation. I do not believe that the Draft EIR adequately addresses how we are going to create enough long-term affordable housing. As it is, much of the affordable housing in the City is only temporary -- for example, the Section 8 and UDAG housing in the

Tenderloin which will become market rate before the year 2000. **D.4 D.5**

While some people are fortunate enough not to be directly affected by the lack of affordable housing, everyone in San Francisco is directly affected by transportation problems. My office receives daily complaints relating to traffic congestion, Muni service and parking, or, more appropriately, the lack of parking. **E.2.2 E.3.2 E.4**

Clearly, one of the most important sections of the Draft EIR is the one on transportation and the question of whether or not we can meet the new demands that extensive and unlimited high-rise development will place on our already overburdened transportation system. This entire section is based on assumptions that projects which don't currently exist will be completed. I question these assumptions. At least one of the projects assumed for completion was recently rejected by the Board of Supervisors, and specifically I am referring to the BART extension to the airport. **E.2.1**

Additionally, there are no indications that even if approved and if funding is found, that the assumed projects could be completed in the same time frame as the new office development. **E.6 P.2.3**

The Draft EIR does not adequately address the loss of blue collar jobs and small businesses in the South of Market area and the resultant impact on the economy of the City and the continuing loss of diversity of the City. **B.4.1**

In the area of seismic standards, the Draft EIR doesn't adequately assess the impact of increased density on the City's already inadequate Office of Emergency Services. I assume that most of you are familiar with last week's news article which pointed out the fact it will take from three to eight hours after a major earthquake for the City's emergency system to even begin working under current conditions. **K.5**

Finally, I did not understand how anyone can assess the adequacy of the Draft EIR without considering the impacts on all of the surrounding Bay Area communities. To that end, I would like to request that before the EIR is completed, that comments be included from all of the relevant regional planning agencies and neighboring counties, including ABAG, the Metropolitan Transportation Commission, the Golden Gate Bridge District, and the Bay Area Air Quality Management District as well as the actual counties of Marin, Alameda, San Mateo, and Contra Costa, to name a few. **N.3 S.1.3**

Thank you.

PRESIDENT ROSENBLATT: John Elberling.

MR. ELBERLING: John Elberling, E-l-b-e-r-l-i-n-g, for San Franciscans for Reasonable Growth. I'm one of the few people who feels terribly constrained by your 15-minute time limit on this document. So I am going to have to focus. I have one quick 30-second item, one two-minute item, and the main part of the comments will be on seismic safety, which I think is the most important part of this document in any sense of the word. **K Z.1**

The 30-second item is about acid rain. The Air Quality section of the DEIR does not discuss acid rain impacts. If you look at the top of the packet on the Chronicle news story from April, you'll that acid rain in fact is a real problem in California, according to the National Wildlife Foundation's latest study. And if you are a trout fisherman like me who goes to the Sierra Nevada, you realize what it means as to wildlife in the Sierra Nevada in particular. Fish will be killed off by acid rain in California unless it's corrected. **I.6**

San Francisco's contribution is part of what affects the Central Sierra. It does need to be noted appropriately in the DEIR. I am not going to take you to court about it, but it's a real matter. And I know my friend Arden Danekas who goes fishing with me would second that. **I.6**

The second item is about urban design. And it's really focusing on the skyline impacts of the Downtown Plan. There are two parts to it, and the letter lays it out. I will just briefly summarize. **H.4**

One is, the authors have chosen to show only one perspective that has a photomontage which depicts the impacts of the new buildings expected upon a city skyline. And that montage is from a southerly point of view, somewhere down by the central freeway. That is a good point of view and it does depict well a lot of potential development. But as anybody is aware, it's not the only view. There is the view from the east, like Treasure Island, and a view from the north, North Beach or even across the Bay. In fact, the City's image, its historic image, its image on postcards -- and I put a Xerox copy of some of those postcards attached to those comments. Its commercial image is not the southerly one chosen, it's the east view from Treasure Island. **H.4.3**

Moreover, when you take only one side to look at the thing from, you obviously are going to miss the impacts of the buildings that are obscured from view from that direction, but would show up if you had a photomontage from the east or from the north. And we believe this is essential, that that work be done, in order to fully and honestly disclose what the heck it's going to look like after you build all these high-rises downtown under the Downtown Plan. **H.4.3**

Now, on an associated matter, the Downtown Plan leaves out in urban design analysis the impact of the Rincon Hill Plan, which is immediately adjacent to the south by the Bay Bridge. I have to note, it does include Rincon Hill when it looks at housing impacts as a housing resource, so it's not fair to count it there and to leave it out when it's talking about how things are going to look. **H.4.3**

When you put the two together, and I copied a few pages from the preliminary draft of the Rincon Hill Plan which exists in City Planning and has been undergoing preparation for a year, which has an EE number, which in fact has an administrative Draft EIR that was held up from publication as a DEIR only because of the recent appeal court decision on CEQA matters -- all these things mean that legally it certainly is a foreseeable project in the sense of cumulative impact analysis. **H.4.3** **N.2**

Visually, it's very significant. Between the Downtown Plan and the Rincon Hill, you have a 200-foot height limit stretching all the way along the one-half block back from the Embarcadero, all the way to Rincon Hill, then, of course, on top of the hill, the Rincon Hill Plan calls for four 35- to 45-story high-rise condo towers. That is going to dramatically change the cityscape as seen from the bay. It's going to essentially, in conjunction with the Downtown Plan's development, double the size of the City's skyline along the City's Bay front. It is going to make a dramatic difference in the image of the City as seen from the Bay Bridge or Treasure Island. **H.4.3**

The project model obviously exists. There are pictures of it in this draft plan. It can easily be worked into the photomontages that have already been done and should be done for the skyline impact, and you simply have to do it to have a legally adequate DEIR. A lot of San Franciscans care very much about how their city looks. **H.4.3**

The main thing I want to discuss is the seismic safety section. You have a very long part of the report in front of you. I'd like to ask you, however, to turn to the page as shown here, No. 16, because that is where it starts addressing what is left out of the Downtown Plan DEIR. I am sure other speakers pointed out last week, it doesn't discuss fire impacts. I don't think I have to elaborate on that. A lot of stuff is presented here in writing. Obviously, you can't possibly do that and have an adequate report.

But it also doesn't discuss aftershocks. **K.2** Aftershocks are very significant because, of course, they come -- even though they are not of the same intensity -- in a situation where you already have weakened structures, weakened buildings, people exposed in very dangerous situations. Aftershocks in their own right have to be looked at. **K.1**

It does not discuss flooding. The particular technical kind of flooding that could occur in San Francisco is called a seiche. It's waves on San Francisco Bay stirred up by the earthquake. **K.3**

PRESIDENT ROSENBLATT: That was . . .

MR. ELBERLING: Seiche, s-e-i-c-h-e. That's a geologic term for wave action formed on a body of water like a lake or bay by an earthquake. It certainly is a real possibility. **K.3**

Moreover, in terms of flooding, I am going to come up under the worst case analyses with questions of the BART subway. **K.3**

The question of emergency services. I wanted to enter into the record specifically an article from the San Francisco Examiner of April 26, which you'll find as the last page, which is headlined, "Disaster Plan Faulty, Latest Quake Reveals," and a quotation from this that is the best to pull out is the Mayor herself saying, "Are we prepared?" -- this is in quotes. "The answer is 'no.'" **K.5**

All material in this article and the whole issue of lack of preparedness has to be fully disclosed in a DEIR. It is simply not honest to pretend that somehow what we have in theory is going to work in practice, when the Mayor herself admits that that is not the case. **K.5**

In terms of exterior materials, the DEIR does acknowledge that some things are going to fall off some high-rises. Whether it's pieces of glass, which happened, of course, in our little minor earthquake a few weeks ago at the Apparel Mart, or whether it's major exterior panels -- nobody knows how many will fall. There is just no way to predict at the present moment. **K.1**

What the EIR does not get into, but what has to be done, is an analysis of which kinds of these exterior materials are less dangerous than others when they fall off. That is to say, when one falls off and hits the street, what has the worse impact? There well may be, and I believe that there is, mitigation measures that by specifying what kind of exterior materials would have to be used architecturally in the future, many lives can be saved in the event of a quake. Basically, these are materials that won't shatter, types of glass that won't shatter into sharp shards. These are the kinds of things that have to be evaluated. And in the mitigation I will say more about that. **K.6**

The worst case scenarios are not in the Downtown Plan DEIR. The worst case scenarios are such things as a rush hour earthquake, which has one chance **K.4** out of 12 of being the case; flooding of the Market Street subway, which is a possibility given the history of ground failures along the Embarcadero, and the proximity of not just the Embarcadero Station, but the planned Muni turnaround and the subways for the E Line extension. **K.3**

Of course, there is the question of fire as also a worst case scenario -- a conflagration being an uncontrollable fire that engulfs entire blocks of San Francisco. **K.2**

The DEIR does not talk really about how many injuries there would be. And in its estimates of deaths and injuries, it chooses only one sample time, a 2:30 p.m. earthquake, to present its death estimates and its injury estimates. In fact, it should show the various possibilities. The best case is like 1906 with the predawn earthquake when death and injuries would be minimized. Worst case is rush hour. In between might be a Saturday; 2:30 in the afternoon is pretty bad. **K.4**

A table should be generated that lays out the differences, depending on what time of the day and what time of the week the earthquake occurs. And, of course, the point is, the earthquake will occur. There is not any question about that. Unless you can stop **K.4** the San Andreas Fault.

In terms of construction-period dangers of high-rise buildings and major commercial structures, you have to realize that the building under construction is a very dangerous place in a major earthquake. Building materials are not tied down firmly. Some things may be attached only temporarily to the exterior of the building, and the construction workers are terribly exposed, not just the people walking along the beam of a high-rise, like the Examiner editorial page cartoon showed, but anybody there who could either be hurt by materials moving about as the high-rise sways back and forth, as it will during a major quake, or who is on the ground below and unattached things rain down behind construction barricades, if not on the sidewalk. **K.1**

Since you talk about construction workers in terms of beneficial effects of employment, you ought to recognize, then, that's a particularly threatened group of people in an earthquake. The DEIR does not include the available historic data on the ground failures in the C-3 District area. They were expensive in the 1906 Earthquake. They clustered around Market Street by the waterfront, not suprisingly, and around Seventh Street and the Western South of Market where there is an underground stream. This material is available and it's very important. **K.1**

If you take a look at Page 22 and following, we are proposing additional mitigation measures, which I briefly want to highlight, that need to be incorporated within the DEIR. First of all, the City needs to contract for a study, a professional study, that is going to test glass and exterior materials under actual conditions to determine which ones are safer, if and when they fall off a building, during an earthquake. That is to say, some entity like Ames Laboratory can construct a tower, take actual samples of precast concrete panels, glass, whatever, drop it, measure the impact at ground level, measure the velocity of the secondary particles, actually help you determine what the dangers will be. K.6

The City also needs to consider -- I am going to skip, if you don't mind, and try to wrap up quickly for you -- requirements, the City can adopt requirements that then the safer materials would have to be applied to all new construction, rather than the dangerous materials used. And we believe at SFRG that it's important that the moratorium on downtown development be extended until you have that information at hand. You should not be approving any new high-rises until you know what the safest material is to use in their architectural design on exterior. That is crazy. K.6

There are very significant sections in the EIR at the back of the book, so to speak, significant environment impacts which cannot be avoided, et cetera. You will see on Page 25 that we propose a major rewriting, revision of that section insofar as it regards earthquakes. And the point is to highlight the dangers, to fully disclose dangers of a major earthquake in San Francisco. The same is true of Section 8, the relationship between local short-term uses of man's environment, et cetera. And the same thing is certainly true about significant irreversible environmental changes. K.7

We propose, and there is not time to present it to you in this testimony, unfortunately, that a new alternative has to be formulated in the EIR, which we have termed "the maximum seismic safety alternative." The question is, since downtown San Francisco is undoubtedly one of the most dangerous locations in the world to concentrate a large working population in high-rise development, are there not better locations in the Bay Area? **Q.4**

The comments in the DEIR try to pooh-pooh that alternative by saying, well, that would have other negative environmental impacts. That is not necessarily so. You can pursue regional planning. You can obviously reorganize, over the long term, transit systems. You can obviously redirect growth if you decide to do it. It's a question of: Does anybody really want to try? **Q.4**

That is what I want to close with, because these proceedings and all these debates we have been going through for years often seem, I'm sure, to people like a big game where the activists come down to fight City Hall and so on. I don't want to trivialize the issues that we have been debating over the years that way. But with earthquakes, not talking about how buildings are going to look or who is going to win the argument this month -- we are talking about how many folks are going to die when it it comes -- how many will be injured? How many might be blinded, crippled, all these terrible kinds of injuries that in fact happen in major earthquake. We don't know if the earthquake is going to come at 5:00 o'clock in the morning or that the epicenter will be 40 miles away, ten miles away, whether it will come at 4:30 in the afternoon. K.4

If you approve the Downtown Plan as it is and the DEIR as it is, you are, in effect, playing a kind of Russian roulette, betting or hoping that it doesn't come very soon, and when it does come, it doesn't come at the wrong time. I don't think that is a morally acceptable posture. At least it's not for myself. I don't think it's good planning. K.4

I think also you have to consider, now that you've been forewarned by this EIR process, there are real questions of civil liability, both for the City and not to mention possibly individuals. K.8

Talking to people like this is sometimes like trying to talk to Republicans about the aftermath of atomic war. But if it can bring it home to you in any fashion, the people on the sidewalk, downtown, when a quake comes -- and let's suppose it's the year 2030.

It may be, Mr. Rosenblatt and Mr. Woods and so on, it may be one of your children, it may be somebody you love. If it's not you, it may be several of your grandchildren. This is not a game. This is something real. There is going to be real human life consequences. And you are going to have to, in the end, stop and think about that on its own terms. **K.4**

Thank you.

PRESIDENT ROSENBLATT: John Bardis, please.

MR. BARDIS: President Rosenblatt and Commissioners, my name is John Bardis. That's B-a-r-d-i-s. **Z.4**

First, there have been people that have raised questions about the process. And it is unfortunate. We have a 1000- or 1500-page document, and we are looking at a process which everyone is lumping together. You are hearing everyone, all different subjects, all at the same time. Obviously, we would have had a far more rational review of the document by simply having hearings that dealt with certain subject areas -- housing, transit, dealing with the alternatives -- than proceeding on with maybe a catch-all hearing at the end. That didn't happen. It has been mentioned by other people, but I think it cannot be overstressed. **S.1.3**

Now, to the body I'd like to address here regarding the subject of this hearing. You really have an extraordinary opportunity before you. There is no other Commission in two decades that has been really charged with the responsibility and assumed the responsibility of really looking over where we have come over two decades or three decades and then, after taking a good look, deciding how we should proceed. **Q.4 Z.1**

This is a tremendous opportunity for really being able to see whether we have been proceeding in good fashion, whether we have been following the proper policies to produce jobs in our City, to provide employment for the unemployed of our people, to provide for transit needs, for housing, the other concerns that are raised. But we haven't. And I really feel somehow in a way that we're in a tragedy of some kind because this opportunity has not really been fulfilled. **Q.4 Z.1**

This process that we're into right now is the last stage of a very long process. It's been going on for five years. And it's probably our last chance -- not only yours as a Commission, but also we as citizens, for really getting a good handle on what's been happening to our City and giving it a clear **Q.4 Z.1** direction.

We have now before us a proposal for zoning the downtown, and we have four other alternatives to that proposal that are being considered in the EIR. Really, all those alternatives are variations of what's happened in the past, and they're variations of one another. They haven't really addressed: What are we doing and what can we do in the future to really achieve more rapid growth, possibly -- a better balanced kind of growth; a growth that probably has less impact on the lives of our people and makes them really tortured each day by the way we go about developing our City; a growth that provides less impacts on the environment. We just simply have said and recast what has been the scenario of the past two decades. **Q.4 Z.1**

Unfortunately, the consultant's study that we have looked at about a year ago, six or eight months ago, sort of brushed over the history of the past and actually ignored it completely and uses the baseline 1981 and 1984, as if we didn't have any past. That is a horrible omission, not only to that consultant's report, but also to this Draft EIR insofar as it incorporates it by reference. **R**

But the most serious deficiency of the EIR is not the minutia about all the different criteria that we're looking at in terms of CEQA -- those will be addressed and they will be addressed in a written form where we can deal with page numbers and deal with the specifics -- but, to sort of keep our perspective here, the real deficiency of the EIR is its failure to really consider alternatives for developing our City and our City's economy, especially in view of what we already know, of what we have gone through, not only in the last two, three decades, but prior to that. There is a whole treasure house of experience that we have had over the last half century that can really give us clues as to how we should be proceeding in these next two decades. Q Q.4

And insofar as we have failed to do that, we have failed to probably reach that alternative that will give us that balance. As a result, we're looking at alternatives now which, in my estimate anyway, are restrictive to the City's growth, if you believe it. If one were to say that we have a proposal for zoning downtown as something that is good for the City's economy, for jobs in San Francisco, for what we may want to have as a base for laying out the foundation for the next century, we really have missed the boat. Because we have not really looked at the alternatives that could produce a far better result -- better in terms of actual growth, of jobs; better in terms of what we have for housing for the people in San Francisco; better in terms of transit. **Q Q.4**

It's unfortunate that we have five alternatives in this EIR and we don't have that identified. It's especially unfortunate, because I alluded to that alternative in the hearings before you in reference to the consultant's study. If you look in that transcript, you'd find it. It might take a little picking out to find. And I would discuss it right now but I don't think it can be discussed intelligently in the time allowed. If we are dealing with something that is going to deal with the next two decades and discuss an alternative that is not even described, we have a real problem in getting it out in 15 minutes. So I will try to do that in writing as well. **Q Q.4**

So the real question we come to then is: How did we really reach this sorry state of affairs where we might have some real solution to our City's problems but we have been maybe denied our actual seizing of those opportunities. We only have to look at how many times we have had those opportunities which we have cast away in the last five years. We did it in the very beginning, when, by some kind of really outright fraud -- and that's the only way you can describe it -- we were told that the City was bankrupt and could not afford to actually pay for the compilation of the data that's necessary to come about with what we have as a decision here and what we may have as a proposal to be brought before you. So that data was handed over to a consultant hired by the Chamber of Commerce, which was because they came up with the money. As a Commission, then, you abdicated providing the data base by which your decision might be reached today and an alternative could be before you today that would be halfway decent and responsive to the City. **S.1.1**

Then we went beyond this process to an obscene kind of length where there wasn't any real involvement or input of the public. And we did something worse. We even heard Mr. Bash mention a earlier a reference to the San Francisco Foundation's efforts to convene something of a group of people. No public meetings, no public notices. And by that process, we were losing the opportunity to get true public participation, true public discussion, as they did perhaps in Philadelphia, in Pittsburgh, in Dallas, when people tried do something about how they're going to develop their city and how it should proceed to be developed. That was lost as an opportunity. We had an opportunity to really lay our strategy for San Francisco, that would really not only provide a strategy for the development of our City, but, because of its overwhelming impact on the region, we could give leadership to the region. We even have the opportunity on that basis perhaps to even give leadership to other urban centers in this country who have been trying to wrestle with this problem, including New York, which we've been prone to imitate as opposed to try and lead them out of their morass. **S.1.1**

So now we have a process where you might have had a much wider participation, which was a pseudo process, provided by the San Francisco Foundation. Then we had the Chamber coming out with a strategic plan, which then is paraded around the country, that San Francisco has really looked at a strategy, that it's really looked beyond what has affected probably one-tenth of the land area of the City in terms of what we have for an urban development strategy. That is really a pseudo strategy, and it's not even worth the term. It's a developer's dream for downtown. **S.1.1**

We also proceeded with a process then of having the consultant's report and then using that for the basis of the Draft EIR. We defined a very narrowly defined area. We also eliminated impacts from the regions and the regional tie-in to what we have as proposed development for our City's economy. What a horrible series of lost opportunities that you have had. **S.1.1**

And right now you probably are at the last chapter of that horrible scenario, and you have this last opportunity now to turn it around. And you have this opportunity to look at what might be alternatives that are not disclosed in this Draft EIR. I strongly urge you to do that, because you have a lot more than just San Francisco at stake; you have the region at stake. And also you have, I really feel, an opportunity here to really show a new course and new direction as how urban development can occur at a proper rate of growth, at a balanced rate of growth, with a minimal impact on the people of that urban area as opposed to what we have had happen in our urban centers throughout this country for the last century.**Q Q.4**

So at this point I'd like to just close by asking you: If you do have in mind to do something about the hearings on this proposed zoning, I would strongly urge you to do it after you have had the final EIR in front of you, because you will not have the information in front of you, then, before you have that document to really proceed on any hearings on this alternative that is before you or the five alternatives. And I strongly urge you to think twice, because if you do proceed on that kind of tack, one can really then have cause to say that you are not only being irresponsible, you may even be almost criminally negligent to the best interests of the people of San Francisco and to your duties to the people of San Francisco. **S.1.1 S.1.4**

I strongly urge you to reexamine the alternatives, to look at alteratives that can better growth, and to really come back to the people with that kind of alternative for the future. **Q Q.4**

Thank you.

PRESIDENT ROSENBLATT: Isabel Ugat.

MS. UGAT: My name is Isabel Ugat, I-a-a-b-e-l U-g-a-t. I am a resident of western South of Market. I have lived there for 30 years. **Z.1**

I can see that the EIR is not really protective of my neighborhood, and I would say that there are 4,000 Filipino families living there. That is the area from Sixth to Ninth and from Minna to Folsom. **A.4 Z.1**

I would urge the EIR to read "a residential," for this reason: Now that it is mixed industrial, we have had many changes in ownership there, and they have overpaid for the property. So, whereas you had people paying like $300 a month for an apartment, now they are paying, asked to pay a thousand. So the speculators are there already. So, therefore, if it's rezoned residential, that is a protection for the residents there, that live there. We don't own our homes. We are renters. There's mostly absentee landlords. And I never did ever see too many signs out "for rent," but evidently they've just been sold quietly. **A.4 N.2 Y.1 Z.1**

And we have had, the Filipino people have had a rash of evictions. And the only thing that we are happy about is that the South of Market Alliance was able to talk to the planners and say that we should work this out together. And so we will begin our planning, I believe, at the latter part of this month. But you can really see the neighborhood and the impacts and what has happened. **A.4 B.2.3 N.2**

I also would like to say something about the Friends of Services for the Arts. I am a member of the Friends of Services for the Arts. Now, the artists have made South of Market a kind of jazzy neighborhood for developers nationwide. But these artists that live in the lofts here are poor artists. Some of them have developed the arts, some of them have been artists there for 20 years. So you are going to have a change of the artists. The artists that are there now cannot afford to be there. And so I hope that we can bring to you a kind of compromise in some ways of how you have looked at it. And now that we have Susanna Montana and different people working down in the neighborhood, that we can have a reevaluation of what really is good for the neighborhood and good for the people there. Because I am sure that artists want to keep staying there. They have developed the lofts. They have hung on a long time. Many of them belong to the Support Services for the Arts on Ninth and Brannon and the Cultural Center. **A.4 B.4**

Thank you very much.

PRESIDENT ROSENBLATT: Jim Firth.

MR. FIRTH: My name is Jim Firth, F-i-r-t-h. My comments will be very brief. I would first like to thank the Planning Commission for holding an additional hearing. I know there had been some discussion as to whether there would be one public hearing or not, and also thank them for extending the time period in which written comments can be contributed to the testimony on this Draft EIR. **S.1.2 S.1.3**

I am active in the Coalition of San Francisco Neighborhoods, and I will be working with that organization in developing the responses to the Housing Element of the Draft EIR. I can say at this point that we have not completed that work, but that it will be in before June the 4th, and that it is necessary for us to do that because we have found that that component has not been adequate in meeting the needs that we see for housing development in San Francisco, whether or not downtown continues to grow at the rate that it's growing. **A.2 D.3.1**

It's with that brief comment that I want you to understand we will be submitting additional testimony and ask your time and your patience in reading through that, because I think that it will be helpful for you in making a decision that is going to be beneficial for the City of San Francisco. **S.1.2**

Thank you.

PRESIDENT ROSENBLATT: Howard Strassner.

MR. STRASSNER: My name is Howard Strassner, S-t-r-a-s-s-n-e-r. I have been requested by the members of the Coalition of San Francisco Neighborhoods to present their position concerning transportation components of the Downtown Plan EIR. **Z.1**

We don't like breaking our analysis up in parts, but we are forced to by time. And we actually deplore a separate analysis of time there, in time, space or component. It should be presented in an integrated fashion. That is what you should have done, and you didn't. **S.1.1 S.1.3**

So we go on, talking about transportation. In recent years, downtown development has proceeded at a rate which has caused unacceptable impacts for the people of San Francisco. San Francisco residents too often suffer from crush loading on Metro or buses. Many have to wait for extended periods to even have some transit they can squeeze into. **E.2.1 E.2.2 E.3.2 E.6**

We typically curse the Muni, but these problems are not entirely Muni's fault. The problems are caused by the rate of downtown development which doesn't provide sufficient time or funds, have the proper mitigations in place before the impacts were imposed. Over our experience, downtown keeps growing and the Muni drags five, ten, fifteen years later. **E.2.1 E.2.2 E.3.2 E.6**

We find that the subject EIR offers us some hope of mitigation by partially funded five-year plans, but only prayers to mitigate against future impacts, impacts to be imposed on top of an already crush loaded transit situation. This is unacceptable. Neighborhood residents who derive no benefits from the downtown have been impacted and will be further impacted by downtown development if proper mitigations are not implemented in a timely manner. "Timely" is the most important part. **E.2.1 E.2.2 E.3.2 E.6**

The Supervisors' Transportation Subcommittee has heard testimony on the difficulties of senior citizens attempting to cross Van Ness at Broadway and even the difficulties younger people have trying to cross 19th Avenue at Holloway. **E.5**

Now, a number of years ago we stopped the freeways. We continue the development of those things that people are used to taking freeways to get to. So now our main streets are used as freeways, and people can't cross them. These kinds of problems are recent developments. They are undoubtedly caused by drivers drawn by the increase in downtown office space. This conclusion is made more poignant when one considers that the population of the City has been declining and the per capita use of automobiles has probably generally been declining as evidenced by the reduction in gasoline sales. **E.1.2 E.3.2**

Local drivers in residential neighborhoods are impacted by what you do downtown. They're facing congestion, and many of them have their driving patterns changed to accommodate through-traffic to the downtown. Many neighborhoods have recently imposed their own mitigations to limit parking impacts. But even preferential parking has some negative impacts. These impacts constitute a reduction in the quality of life in our City. We consider these impacts unfair and unnecessary. Most of the impacts could have been easily avoided if adequate mitigations were implemented in a timely manner. **E.3.2 E.4 E.6.4**

Unfortunately, the EIR does not even consider the effect increased congestion has on streets outside of the downtown as an impact. They list a handful of intersections downtown, and they say the impact, the congestion is going to get worse. They don't discuss any of the intersections out where people live. And these will also be impaired. **E.3.2**

This is a major fault of the EIR. The increasing congestion on City streets will cause further delays and crush loading on Muni service worse than predicted in the EIR. They know they're getting more cars in the Muni and they say that some Muni runs will be more crowded. But they really don't -- if they get more traffic on the streets, even if there are more cars, the situation will be still worse. And that, we have to do something about. Okay? **E.2.2.3 E.3.2**

If we consider and modify impacts to consider all things, we can go on and talk about mitigations. The EIR lists 52 transportation mitigations. These mitigations, if properly imlemented, would tend to alleviate the impacts. However, the EIR presents no certainty that mitigations will be implemented. History indicates that transportation improvements lag the need until we learn to accept the lower quality of transit. And improvements never quite return us to our previous standards. **E.6**

My own example. I am blessed by having the availability of Muni Metro transit, which may be considered one of best transit systems in the country. However, one has to think -- is the commute from my neighborhood better or worse than it was when the old PCC started operating? Now, time-wise, there used to be an advertisement on the West Portal that showed that you could get down to Kearny Street in 17 minutes. Maybe that was slightly exaggerated. But time-wise from West Portal, you don't get downtown any faster. You are obviously much more crowded. We have crush loading. And I have to put up with a ride underground, with its lack of safety and lack of visual delights of Market Street and all that kind of stuff. And even when I get downtown, I have to wander through a crowded station to get to where I'm going. And the service is not as good because you don't have as many stops. **E.2.2**

Even in the example, with the best transportation that money can provide, was attempted to be provided, it's not as good as it was. And all because we are trying to accommodate downtown growth. That is not reasonable. **E.1.7 E.6**

There are three major requirements which must be in place before mitigation can be implemented. The EIR is only a wish list of mitigations and cannot assure that they will be implemented. The first requirement is money. Only partial funding is available for initial required increases in transit capacity. Necessary future improvements are identified, but there are no firm funding commitments. Time is always a major requirement for transportation facility additions. Lead time for equipment, design, public review and financing requirements all take time. And so this is the kind of reason that we have, lowering standards of transit before we get our transit. **E.2.1.2 E.2.7 E.6**

Probably the greatest problem of all is political. The people and their government must change. And in this, the people share most of the problem. We must reduce our desire to drive our private automobiles into downtown. We must increase our willingness to accept the tunnels of construction adjacent to our businesses and homes. We have to stop saying, "No, you can't do that," when it comes to construction. Will we? Who knows. **E.3 Z.1**

We must be willing to pay for increases in transit capacity. And it's going to cost us a lot. We must implement a transit-first policy. This is something we have talked about but really haven't done it. But when you continue building in downtown, it becomes more and more essential. And the EIR says that. **E.6 E.6.2.4 E.6.3 Z.1**

Only if we change in these ways can we maintain reasonable transit standards while downtown grows. What most of us want is perceived advantages of downtown growth without paying the price of the changes required. The EIR is completely correct when it points out that these changes must take place. The problem is that everyone hopes that someone else will accept the changes so he won't have to. And that is going to have to change. **Z.1**

Because of all the difficulties involved in implementing the mitigation, we cannot be sure they will be implemented. The EIR agrees that many mitigations are essential. The EIR on Page V.E.1 states that, "If a plan or proposal similar in nature or intent are not followed, then the growth rate may need to be slowed as a matter of deliberate public policy." That is what I want to talk about. **E.6.1 P.1**

We must insist that the necessary mitigations be scheduled item by item in the EIR along with the maximum permitted annual development. Now, when I think about this, this is not such a big deal. In many of your projects, you require the developer to construct mitigations. Here, the developer cannot construct the mitigations, so you just say to him, "You can't do your project until we get these mitigations in place," and all the agencies and all the people have to commit themselves to getting them done. It's not a big step. It's a pretty small step. But it's essential. Otherwise, we continue in a mess. **E.6 P.2**

In fact, since previous impacts have already reduced the quality of transit service, some mitigations are necessary before any additional development should be allowed. Therefore, the ordinance which creates the Downtown Plan should include, as a first stage, a low-end rate of development until some of the HOV and contra-flow transit lanes discussed in mitigation Item 15 and 19 are implemented. This will indicate that we are serious about solutions to the transportation problems and encourage people to comply with the content of the Plan, while improving service for some transit users, all at very little expense. **E.6 P.2.1**

The first stage should also include completion of funding and completion of a significant portion of the Muni and BART five-year plans. So, we are behind so many years, and we should do some transit building before we continue just downtown buildings. **E.6 P.2.1**

The second stage should include a finite amount of development in parallel with the completion of the five-year plans, and additional finite amounts of development should be only considered after each step of necessary transit projects and systems change is undertaken. **E.6 P.2.1**

We feel if the ordinance includes a requirement for completion of mitigation, the developer will provide necessary pressure to implement the mitigation. **E.6 P.2**

And based on last week's testimony, care should be taken to ensure that none of the steps that are also being counted are required for service in other counties are required of a multi-county system. **E.2 E.3.1**

Since we believe that the motivation of the public to deal with the transportation systems necessary to ensure the success of your Downtown Plan, while preserving liveability of our City, is our biggest problem -- we have seen the enemy, and it's us -- we are the problem. People have to do changes. **Z.1**

We are compelled to offer you the 53rd mitigation. We suggest that the EIR include a suggestion that the parking tax be increased. In my own experience, as each increase of the parking tax was implemented years ago, there was subsequently, for a month or two, a reduction in parking downtown. Of course, it caught up. The tax should be on each parking place and should be increased annually until tax revenues reach a maximum. That is, the percentage decrease in the number of parking places is greater than the percentage increase in the tax. This would be a slow tax. Each year you let people down in San Mateo know, they can look forward to the tax that's going to increase every year, and they better get started thinking about their problems. **E.6.4**

The annual increase could be $100 to $200 per parking place per year, only 50 cents or a dollar per working day. Ultimately, the City would be collecting additional revenues from 50,000 parking places times $2500 per place per year, or $125 million per year. That should get someone's attention. But the most important thing is that it gets people thinking about transit costs. **E.6.4**

This could be used to fund most of the City's transit improvements. More importantly, it would tend to induce more people to carpool or ride public transit and help them to convince their county governments to meet their transit obligations. **E.6.4**

Your Downtown Plan requires a revolution in people's commuting habits for fulfillment. The 53rd mitigation provides the incentive to start the revolution. Just a couple more minutes. **E.6.4**

If you see that there's some probability that all this won't happen, then your EIR should have included another alternative. Development could be severely restricted in San Francico and encouraged in East Bay communities. Modern electronics and the BART would make communication between separate downtowns quite efficient. **E.6.1 D.3.2.4 Q.1 Q.2**

Transportation times for new downtown workers who will want to live in the East Bay will be 10 to 15 minutes shorter. San Francisco would have time to correct the present shortages of transit and housing, and the aesthetic and cultural objectives of your plan will be met without the pressure of excessive growth. **D.3.2.4 Q.1 Q.2**

Conventional wisdom holds that new development provides jobs for unemployed San Franciscans. This is not so. Unemployment in San Francisco is less than the rest of the state and the nation. Our unemployed are not prepared to perform the office jobs that will be offered. The only current San Francisco residents who will get jobs in the new developments are construction workers. These jobs will only be temporary. And if we keep doing this kind of thing, we will have to keep doing it. And we're on an island and have reached a limit. The work will be done by new people to the area who will try to squeeze into San Francisco housing and transit, but choose to live in surrounding counties with similar problems. We must be very careful not to destroy the quality of life in San Francisco to benefit people who haven't moved here yet. **B.5 B.5.1 B.5.3 Z.1**

My normal tendency would not be to help make a success of the Downtown Plan, but I've learned over the years that development will proceed, so let's do it right. **A.1**

Thank you.

PRESIDENT ROSENBLATT: Thank you. That is the last speaker's card we have. Can we have comments now from the Commission?

MS. HESTOR: May I have 30 seconds? Sue Hestor, H-e-s-t-o-r. One little traffic count. 5:20 from Powell and Market to -- on the 21 -- to Larkin. I counted the number of standees. Now, this is not the peak of the peak; it's after 20 after 5:00. Twelve standees from Powell, increasing up to 19 at Polk, with people getting off at the stop. So it was not just a reflection of people being added. There was that much transition going on on that one bus. That is further evidence that your traffic counts are not particularly great on the Muni. **E.2.2**

Secondly, when I was listening to Scoop Nisker on KFOG this morning, I realized that there is an amazing amount of data, really very accessible, on Bay Bridge and traffic problems in the a.m. rush and the p.m. rush, namely, all those Triple "A" counts that the radios use that provide traffic counts. And KFOG, which is not exactly the main driving station, which is what KCBS does, has those. I would suggest that for a one-month period, the Planning Department get those same traffic counts, which start probably at 6:00 a.m. They tell you how long on, you know, every 15-minute or every half-hour basis, the wait is on the Bay Bridge approach. This morning there was apparently a ten-minute delay at the Caldecott Tunnel. And they tell you what the factors are that are affecting it, like a truck overturned or a spill or an accident or just normal commute problems. Since you don't have very much traffic count data, especially in the a.m., and that is easily available, I would suggest that you do a one-month survey of all of the times for which Triple "A" and/or KCBS or other independent services have that information and put it in an appendix. Let us see how much the traffic is backed up on the Bay Bridge every day. **E.1.3**

And my final comment is: I think maybe people should get the text of those songs that people are singing in this competition down in the rotunda and see if any of the songs that people are really fighting about talk about their love for San Francisco because of the concentration of financial institutions and the rim of the Pacific and office buildings -- **Z.1**

[Laughter]

MS. HESTOR: -- or what it is people have as their image of the City. I mean, maybe you can find those somewhere, buried in one of those verses. The words that I hear coming through the transom and leaking under the door don't talk about that kind of San Francisco. **Z.1**

COMMISSIONER BIERMAN: I'll try to do mine very quickly. Page 1.B.2 has a table, and one of the figures is that industrial warehouse and automotive uses, the gross square footage will be off 20 percent by 1990 and 42 percent by the year 2000. **B.4.1**

On Page 1.C.2, the employment in those uses will be off 13 percent by the year 1990 and 32 percent by the year 2000. In connection with that, I'd like to point out, on Page IV.C.35, we seem to be writing off

B.2 B.4.1 B.5.1

manufacturing and industrial and distribution uses. Seems to be a foregone conclusion that we're letting it all go, planning for its being forced out. I'd like the EIR to talk about what planning could be done that might save some of those blue collar jobs. I can't believe that we should take it as a foregone conclusion. **B.2 B.4.1 B.5.1**

Then Page I.B.2 -- and this is just a small thing, but I think we need something in there, a table or a map or something about what the subareas are. It would make easier reading. **A.1**

Page I.B.6, I'd like it justified in the first paragraph. It says that, "The application of OHPP city-wide" -- that's our Office/Housing Production Program -- "be presumed to result in less development outside of the C-3 District." I don't know what they base that on. Is it a guess? Would you please explain it further. **D.5.1**

Then about transit. On Page I.E.3 there is this paragraph: "Peak hour operating conditions on San Francisco streets would be expected to deteriorate by 1990. Areas near freeway ramps which are already experiencing level of service E and F operation in the peak hour would be expected to continue to operate in unacceptable conditions and may deteriorate into jammed conditions with increasing frequency. Further, peak hour conditions would be expected to deteriorate at all of the downtown intersections by the year 2000. Expanded areas of traffic congestion would disrupt surface Muni operations. Service to the northwest portion of the city would be adversely affected by level of service E conditions at Sutter near Stockton and Montgomery and California. Peak of the peak conditions would be expected to occur over longer periods by the year 2000." **Z.1**

In reading that, and I have a couple other transit paragraphs, is this really planning? Is that what we really are charged with doing? Do we really want that kind of a mess, or is there something that we can do that's a little less than that and a little better than that? **A.1**

Then on Page IV.E.1 through Page IV.E.7, that whole section deals with transit. It seems to me that a corridor analysis doesn't give the whole picture; it gives a false picture. I still think we need line-by-line analysis. And I know it's a broken record, but I think it's wrong to not have it. **E.2.2**

There should be a table of the line-by-line use as of today. Even if we can't have the future projections, at least we should have an accurate picture today. Also there should be pictures, and I was really startled to see that in this whole Downtown EIR, they took out all the pictures of the crowded Muni. It's as if we're trying to say everything will be just great and it's all going to be taken care of and don't worry about a thing. And I think some way we have to visually and in figures show what the current situation is. It's the only way I can see to operate. **E.2.2**

One other note I had -- I have a couple more -- but childcare was discussed by quite a few people last week. And I would not like to see an answer come back to us that there isn't anything else we can do besides give bonuses that we're suggesting for childcare facilities. I think that we got some data last week of other places -- hospitals, other institutions -- that are doing their own childcare, and I'd like us to look, if there is any way -- I know in the paper, and I should have clipped it, but there was something about some Southern California businesses starting to do childcare, and it was pushed by a City. I don't know whether the Examiner or Chronicle would have it listed under "childcare," but I wish that we could, I hope that we do justice to that particular issue. **Z.2**

On Page I.I.2, it's hard to accept -- maybe that's "I." Well, I.I.2. Hard to accept the air quality statements that everything is going to be so much better. I'd like to know where the 11 test sites are. Now, maybe that's in the appendix and I didn't get to it. Were they monitored at peak hour when levels of E and F are in effect? Are we getting any kind of picture of what pedestrians and people waiting in cars that are still running and are waiting -- we don't know how long -- whether any of that is pictured in this EIR. **I.2 I.3**

I.I.3, it's stated here, "Further revisions of growth management will be required in the year 2000 or before." It seems to me that those property owners who would be affected now adversely and are wanting the Downtown Plan allowances, or more than we may allow under the Downtown Plan, are, in effect, being favored over those who may not get any development rights once the year 2000 comes and we are jammed so that there's just nothing more that can be done. I'd like it discussed whether a fairer way and a smarter way would be to face up right now to what the problems are going to be -- allow less development now and allow some then. The business of going ahead huckledebuck now, shadowing open spaces -- if they aren't maybe some special park -- shadowing streets, sidewalks, when, the year 2000, we can't do anything, and we'll have a miserable city -- is this really the route we want to take? Q.2

I think John Elberling's discussion of the earthquake problem really fits in with that, and we ought to really take a look at whether right now is the time to say, "Gee, we've got a good skyline. We don't look like my hometown in Nebraska. We look big deal, K big time." And now is the time to take it seriously. H.4.3

There are just a couple more. I.I.10 and I.I.11, please list disadvantages of forecasting method as well as advantages. There's a long list of advantages and it doesn't say anything disadvantageous. And I.I.11 and I.I.12, they blithely say we can't have any data on the indirect effects on City finances. Some system must analyze, at least as best is possible, what the effect on hospitals, schools, parks and social services will be. I can't believe that I as a homeowner have to bear the whole brunt or that those of us who own other property are given all the credit for all that. It seems to me that downtown pays, and some way we ought to be able to see what the effect is. B.1.4.8 Z.3

Just a couple more. IV.A.4, how do we know for sure that increased transit use will alleviate congestion and undesirable side effects of commuter travel through the City's neighborhoods? That statement is in there. Please analyze the real effects of increased transit use through neighborhoods. I've asked for that before, but now that they're saying "It will be fine," that is unacceptable. Makes it inaccurate. We need to know headway times. We need to now what a given cost will be from increasing in the Geary Corridor or whatever corridor is projected as needing more. **E.3.2 E.2.2.3**

No new freeways are recommended, but what evidence is there that they won't be required, given longer and longer peak hour jamming on transit as well as on freeways? It presumes a tolerance on the part of commuters that may not be real. Can we really trust ourselves and elected officials to deny the right of people to avoid two- and three-hour commutes? Will that pressure really be so much that we'll have to have freeways? I don't think we can presume we won't. **E.1.4.2**

And I just have one more, I guess. IV.A.15, how can we deal with everything under the sun and have no recommendations re the need of various income levels about housing? Page 41, 42, 43, and 44 regarding housing have no recommendations. Why? I see no justification for that. Surely, planning for people's shelter is as important as flag poles and other design issues that we've dealt with. **A.2**

That will do it. Thanks.

PRESIDENT ROSENBLATT: Are there any other comments from the Commissioners?

COMMISSIER BIERMAN: I'm sorry. I have one other. IV.B.50 and 51, why is the OHPP not evaluated as an impact of the Plan? I don't understand. I think it should be considered. **D.3.1 D.5.1**

Page IV.B.53, the last paragraph. The fourth and eighth lines, "would" should be "may." Without policies in place, only a possibility exists for protection of housing. Too much protection seems to be assumed. **B.4.2**

And then IV.C.25. It's interesting to note that hotel workers have a high rate of couples with children, higher than other employment groups. When we deal with the OHPP, it's possible that future hotels should probably be asked to look at that particular housing issue, and would the EIR please deal with that. **B.4.2 D.5.1**

PRESIDENT ROSENBLATT: All right. As I mentioned before, the public comment period will remain -- sorry.

COMMISSIONER SALAZAR: Just, and I hate to come back to this, but let me be specific about what I think. Mr. Elberling bothered me. I've been told that if we have an earthquake downtown at noontime, let's say, that we could develop -- you'll have all the glass popping out of the windows, cracking, swirling -- like a razor storm on the pedestrians underneath. That we'll have all of the granite that is along the side of the buildings falling down. Also, the rush hour. K.6

And I've just assumed that there is really nothing we can do -- that that is probably true and that there is nothing we can do about it. But is that assumption correct? Is there something we can do in terms of the, assuming we are going to build a whole slew of high-rises between now and the year 2000 South of Market, is there something else we could do that might make that kind of scenario not quite so deadly in that area? K.6

It bothers me. I don't know what we can do about it. But I think it's something we should give some thought to. My assumption right now is that we can do nothing. But it bothers me. K.6

PRESIDENT ROSENBLATT: The public comment period is to remain open until the end of the working day on June 4th, and the Department and the Commission will welcome written comments from anybody.

At this point, a motion would be appropriate to close the public hearing.

COMMISSIONER SALAZAR: So moved.

COMMISSIONER KLEIN: Second.

PRESIDENT ROSENBLATT: All those in favor? Opposed? Motion is adopted unanimously. That completes our business for today.

[Whereupon, the proceedings in the above matter adjourned at 7:20 o'clock p.m.]

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STATE OF CALIFORNIA)
) ss.
COUNTY OF MARIN)

I, RICHARD S. ADAMS, do hereby certify that the foregoing transcript was reported in shorthand at the time and place therein stated. I further certify that the foregoing is a full, true and accurate transcription of the proceedings to the best of my ability.

I further certify that I am not of counsel or attorney for either or any of the parties named in said action, nor in any way interested in the outcome of the cause named in said caption.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office this 6th day of May, 1984.

Richard S Adams

RICHARD S. ADAMS
My comm. expires FEB 17, 1987

LETTERS RECEIVED
DURING COMMENT PERIOD

451 Kirkham
SF, Ca. 94122

San Francisco
Planning Commissioner
c/o Planning Department
SF, Ca.

dear Commissioners:

I would like to urge the Commissioner to reject the Downtown Plan's EIR. The Plan has not addressed the needs of the City in a manner which is effective or well thought out. It is not a Plan which can be implemented to truly meet the pressing needs of the city.

Specifically: Z.1

1) the availability of the Downtown Plan EIR to the public before the hearing has not allowed for sufficient time for community under-standing or response to the plan;

2) that the EIR did not consider other options or plans (i.e SFRG's S.1.3
proposal);

3) that the plan would result S.1.1
in increased development in the

South of Market area. **A.4 B.2 B.4**

For these few reasons and for many more that time does not allow me to list, I again urge you to not accept the downtown Plan EIR and to reconsider and include other options. **S.2**

Thank you.

Charlene Clarke

473 11th Ave
S.F. 94118
4/11/84

Dear Toby:

The process you've promulgated for the Downtown Plan & DEIR is a travesty of Democracy. **S.1.1**

Why are you so quick to limit alternatives and plans for the future of the City? Extend the process, Consider more alternatives and **S.1** let the people speak. John [illegible]

April 12, 84

Toby Rosenblat, President
[illegible] F City Planning Commission
450 McAllister St 5th Floor
S.F CA 94102

re: Downtown EIR Hearing

Dear Toby Rosenblat:

I write to you to add one more voice in favor of the need for a better process for the Downtown EIR hearing + approval. Here are my concerns. S.1

1. We need more than one hearing – the document is 1100 pps – not including companion studies that need to be consulted S.1.3
2. We need more time for comments – I am sure that hearing the testimony will help me better understand the document + will probably raise more concerns that need to be addressed for the record. S.1.3
3. What happened to the other alternatives why are we only seeing one preferred alternative. S.1.1
4. The zoning document accompanying the plan is very difficult to use – would Q

p2.

like to see it cross referenced with the EIR - ie which sections of the EIR relate to what zoning changes - **S.1.4**

5. Why is there NO reference in the EIR to other large projects in the planning stage in So. of Market. like Mission Bay. **B.2.1**

D.2.5

E.1.9

Thank you for your concern and for the opportunity to express these views.

Sincerely.

Regina A Sneed

225 Duboce Ave
#103
SF CA 94103

K THE RON KAUFMAN COMPANIES
COMMERCIAL REAL ESTATE
BROKER · DEVELOPER · CONSULTANT

April 23, 1984

Planning Commission
City and County of San Francisco
450 McAllister Street
San Francisco, CA 94102

Dear Commissioners:

Re: Transportation

Because the Downtown Plan hearings are in progress I would like to re-emphasize certain transportation matters that have been of concern to all of us during the past years. It is my opinion that there are many common sense and relatively low cost solutions to the short and mid-term transportation problems that can be enacted quickly. These are solutions that all of us have advocated for years and yet it seems very difficult to actually get them enacted. Many of these solutions could occur rapidly if you and other City officials exert leadership. It is a shame for reactionary groups and the media to whip the public into a transportation hysteria that will only harm this great city. **Z.1**

1. High Occupancy Vehicles (H.O.V.). Cal Trans has been studying the possibility of converting their lots under the freeways to free parking spaces for van pool vehicles coming into the City from any direction. These lots are easy walking distance to the C30. This practical, low cost solution would encourage H.O.V. and in turn lighten the load on the bridges and freeways. It is easy, fast and somebody from City Planning should be working with Cal Trans on a crash basis. **E.6.4.1**

2. During certain peak commuting hours, single passenger vehicles should be prohibited from the freeways and bridges, unless with special permit. This is being done in other cities, including I believe, Washington, D.C. **E.3.1**

3. Firms with 100 employees or over should be required to have staggered hours and have an "in-house" van pool coordinator. Hour changes do not have to be drastic and could start an hour earlier and end an hour later than usual. **E.6**

4. We should study reverse flow lanes on the Bay Bridge at AM and PM peak commute hours. **E.3.1**

Planning Commission
Page 2
April 23, 1984

There may be many other similar solutions that cannot wait anymore for your action. If not now, when? **Z.1**

Thank you.

Respectfully yours,

Ron Kaufman

c/c Mr. Dean Macris
    Board of Supervisors
    Mayor Dianne Feinstein

RK:lb

Linda - this is [illegible] while Dean was [illegible]

RECEIVED

APR 24 1984

April 21, 1984

Dean Macris, Director
Department of City Planning
450 McAllister, 5th Floor
San Francisco, CA 94102

Dear Dean Macris:

I recently learned there will be only one public hearing for the massive DOWNTOWN PLAN, some 1,100 pages of material with over 4,000 pages of background resource material from which much of the 1,100 pages were drawn. Even if all interested San Franciscans were speed readers, it is impossible to adequately review the D-P in a month or so. **S.1.3**

Establishing one public hearing, whose basic process of a long string of speakers droning on before a bored Commission and tired Staff is antiquated and ineffective -- establishing one public hearing on such a massive proposal is totally irresponsible. It appears to me as a tactic of attempting an end run around the public. Given the obvious impact excessive downtown highrise development is having on San Francisco, on me and all around me, your limitations on public participation in this DOWNTOWN PLAN reflects your lack of faith in the integrity in the PLAN. **S.1.3**

What kind of a scam are running with ONE PUBLIC HEARING ON YOUR PLAN FOR 20 MILLION SQUARE FEET OF OFFICE/DOWNTOWN DEVELOPMENT, WITH LESS THAN 45 DAYS FOR THE REST OF US TO READ, CONSULT, DISCUSS, ANALYZE AND RESPOND WITH FACTS, INSIGHT AND SERIOUS ALTERNATIVE DATA AND PROPOSALS? **S.1.3**

It is arrogant beyond belief to limit public participation in this PLAN. I know if you were personally liable for litigation brought by abused SF citizens, or liable for the consequences of unbalanced planning this D-P endorses, you would be more solicitous of community interests and input. **S.1.3**

Thus, I am only able to conclude you do not perceive yourself and department as responsible to the people of our City, but [illegible] only to the Mayor and certain financial and development interests. **Z.1** **S.1.3**

By the way, what's the hurry to get the D-P approved? Where are we going that public involvement must be avoided? Is this PLAN similar to early 20th Century Los Angeles County Water Scam? ala "CHINATOWN?" Or is it so flawed it cannot stand the light of public scrutiny? **S.1**

Keep in mind: we live with the impact of your D-P, & with current development; we pay for your department & its plans; AND we pay for the litigation subsequent to irresponsible planning. **S.3**

I WANT a 120 day extension of public hearings.
I WANT specific hearings scheduled three weeks or more apart on each of the major facets of impact and concern: (1) The APPROPRIATENESS OF MORE OFFICE DEVELOPMENT IN SF; (2) TRAFFIC; (3) TRANSPORTATION; (4) HOUSING; (5) RECREATIONAL & CULTURAL FACILITIES; with a final hearing 30 after these. **S.1.3**

Finally, I WANT the Department of City Planning to grant to San Franciscans for Reasonable Growth a grant to fund their independent participation and study of the DOWNTOWN PLAN. This may strike you as a bizarre request, but their thoroughness surpasses that of your own department, and their standing in the community as representative of the rest of us is unexcelled. And the money your department runs on is our money. **S.3**

sincerely, Denis Mosgofian

Denis Mosgofian
Inner Sunset Neighborhood Committee
1227 Tenth Avenue
San Francisco, CA 94122

cc:John Bardis
Allan Chalmers
Sue Hestor
Mayor Feinstein
Board of Supervisors, each member

SAN FRANCISCANS FOR REASONABLE GROWTH
88 FIRST STREET, ROOM 600 • SAN FRANCISCO, CALIFORNIA 94105 • TELEPHONE: (415) 665-5417

RECEIVED
APR 24 1984
CITY & COUNTY OF S.F
DEPT. OF CITY PLANNING

Sally Maxwell
Department City Planning
450 McAllister 5th Floor
San Francisco, CA 94102

Dear Ms Maxwell:

Enclosed is written comment on the Downtown EIR submitted by the SF Police Officers' Assn. which I am forwarding to you for formal comment. **Z.1**

Sincerely,

Esther Marks

encl.

San Francisco Police Officers' Association

510 Seventh Street
San Francisco, California 94103
(415) 861-5060

CROCE A. CASCIATO
President
PAUL C. CHIGNELL
Vice-President
GERALD J. SCHMIDT
Secretary
DUANE COLLINS
Treasurer

April 9, 1984

Esther Marks
125 Upper Terrace
San Francisco, CA 94117

Dear Esther:

I have reviewed the Notice of Public Hearing on the Draft Downtown Environmental Impact Report and I will comment on it on a page by page basis.

(1) Pages I.F.1 and I.F.2; I have insufficient data with which to comment as to whether or not the increases in reported criminal incidents will take place as described in these pages. **F.2.1**

(2) Pages IV F. 11 and IV F. 12; I again would have to state that I have insufficient data to either concur with data presented or disagree with it. **F.2.1**

(3) It is the general overview of this, I feel that it is impossible to tell which specifically will be generated by the new Downtown Plan. As a matter of personal opinion, I find that if the increases in population and the increases in retail spaces as well as office space occur in the manner in which the proposed, the probability is that you will not have your street crimes type situation but you will have more of the white collar crime and dispute type calls for service. In some cases these types of calls utilize more of the officer's time than the former. **F.2.1**

Sincerely,

Croce A. Casciato
President

CAC/yh

28

George Williams
Assistant Director,
Plans and Programs
Department of City Planning
City and County of San
Francisco
450 McAllister Street
San Francisco, CA 94102

April 21, 1984

Re: Draft EIR on Proposed Downtown Plan

Dear Mr. Williams:

This letter is to comment on the Draft Environmental Impact Report for the proposed Downtown Plan. I am an urban planner by profession, and I personally care very strongly about downtown San Francisco.

Parts of the Draft EIR, such as the analysis of alternate skylines, are well done and impressive. However, the document is very inadequate in dealing with geologic and fire hazards. Considering San Francisco's history (and prospects) those are the subjects it should have addressed most thoroughly.

The Draft EIR casually mentions that in a strong earthquake buildings, even new ones meeting today's codes, will be liable to rain a great deal of glass and cladding onto the sidewalks below. There is no special analysis of this threat—nor of the safety implications of the Downtown Plan's policies to preserve cornices and other architectural projections on old buildings and feature them in new ones. Yet the danger of falling objects is an absolutely critical concern. As the Draft EIR itself admits, at rush hour in the year 2000 there could be some 300,000 people on those sidewalks.

The document does not include an adequate and realistic discussion of fire hazards. This should take into account the vulnerability of many postwar (and likely future) buildings due to their great height, use of "sophisticated" air conditioning and other systems, and use of highly flammable or toxic plastics on interiors. If a future earthquake ruptures enough gas lines it could produce a whole series of "Towering Infernos"—even a repeat of the 1906 conflagration, but this time with far more people trapped inside.

Nor does the document convey a real sense of the enormous deathtrap represented by the hundreds of unsafe old masonry buildings, especially in the Tenderloin and South of Market, which the Downtown Plan would retain without any special efforts to reinforce them.

In evaluating the seismic implications of its five identified alternatives to the Downtown Plan, the Draft EIR makes a dubious and superficial comparison wherein the risk represented by varying amounts of new-and-presumably-safer construction is balanced against the benefit of removing varying amounts of relatively-unsafe old buildings displaced by the new construction. This comparison apparently doesn't take into account quake-related fire hazards—nor the hazards of falling glass and cladding, which are especially significant for the taller new buildings. The document then draws the amazing conclusion (page VI.2) that "All alternatives would result in similar exposure of people to seismic hazard"!

It then poses a false choice by saying that the seismic-hazard impact could only be avoided if there were continued "permit moratoria" in downtown San Francisco, redirection of "all growth" to other places, and the encouragement of "urban sprawl." This attempted rationale is utterly unconvincing. And the Draft EIR's whole response to seismic and fire hazards is needlessly fatalistic.

The document should describe and evaluate at least one more alternative to the project: a "Safety" alternative or alternatives which would actually incorporate serious policy and vigorous implementing actions to manage and reduce hazards in downtown San Francisco. This would include measures such as stronger code requirements for new buildings and greatly accelerated action to reinforce or remove risky older structures. It would depart from the Downtown Plan's policy in various ways, such as by shifting the proposed C-3-O(SD) boundaries to avoid those blocks with the worst geologic hazards. It could also include some limit on the amount of growth in downtown San Francisco.

Despite what the Draft EIR contends, considerable growth could be redirected to other locations without fostering undesirable urban sprawl. The Bay Area actually has a "polycentric" structure that makes sense in terms of its geography and seismic hazards. There are several centers such as downtown Oakland which are less congested than downtown San Francisco; have ample, relatively safe sites for construction; and have good access by transit. Redirecting some of San Francisco's potential growth to such other centers would also help to ease pressure on the City's own housing market and transportation systems.

The Draft EIR does list (pages V.K.1-V.K.4) a series of possible mitigation measures relevant to geologic hazards. But they are blithely prefaced by the statement that "None of the following mitigation measures is proposed as part of the Downtown Plan"!

Indeed the Plan itself totally avoids discussing seismic and fire hazards. So the Draft EIR's "mitigation measures" are only actions that could be taken if the politicians felt like doing so. Judging by the Board of Supervisors' recent rejection of greatly needed improvements in seismic code standards, there is no reasonable expectation that sufficient mitigation measures will be adopted independently.

The Draft EIR does not say why the mitigation measures are not proposed as part of the Plan or as a condition for its approval. Nor does it demonstrate that adopting these measures would be unfeasible. To quote Section 15021 of the State CEQA Guidelines:

> CEQA establishes a duty for public agencies to avoid or minimize environmental damage where feasible....A public agency should not approve a project as proposed if there are feasible alternatives or mitigation measures available that would substantially lessen any significant effects....

Sincerely,

JOHN S. ENGLISH

John S. English, AICP
2500 Hillegass Avenue
Berkeley, CA 94704

Rec'd @ public hrg on
4/26/84 DTP
DE 112

I Sewers: Each Building

Recycle the water in each building within that bldg. Won't need sewer hook-ups.

1. All sink-wash and drinking water waste return to purifier and re-use. Won't need P-traps under sinks which often plug up because this pipe will not lead to gassy toilet sewer.
2. Toilet Water -
   Set up methane converter tanks and use gas for that buildings utilities F.1.3
   Used in Sweden

II Require Solar and or Wind power Utilities plus use methane gas from new sewage usage. G.1

III
Quake-Shake gas shut-off values - require this on all new construction and perhaps on all bldgs in S.F. since during 1906 quake, the fires were caused by leaking gas lines K.6

Natalie Friedman
925 Goettingen
San Francisco, Calif
94134

Rec'd after public hearing 4/26/84

California
STATE EMPLOYEES' CREDIT UNION
No. 2

S E
C U

April 26, 1984

Department of City Planning
City and County of San Francisco
450 McAllister Street
San Francisco, CA 94102

RE: Notice of Public Hearing on Draft Environmental Impact Report EE8.3 Downtown Plan

Dear Commissioners:

On behalf of California State Employees' Credit Union No. 2 located on 41 Van Ness Avenue, San Francisco, we respectfully yet strongly, object to Downtown Plan EIR generally, and specifically we object to the inclusion of 41 Van Ness in Category I. **Z.1**

Our Credit Union serves over 22,000 employees of public organizations and their families. When our building was purchased a few years ago it was purchased as an investment to grow as an asset for the benefit of our membership. We feel that the architectural designation of such buildings as ours being placed on a restricted list such as Category I will be detremental to the employees and members of our Credit Union by severly limiting a considerable asset for future use. **Z.1**

The history of the building, which was built in 1911 as a funeral home, remained such until 1977 when it was sold to an art dealer. In 1979 the Credit Union purchased the building and since then we have remodeled both interior and exterior as well as added on to the structure. **Z.1**

Category I, which is supposed to include "architecturally significant buildings", should not include every "old" building just because of its age. We feel that the original structure is not architecturally significant and that additions have even further removed it from this category. From an historical standpoint there has never been any historical significance to this building. **H.1.2**

We agree that buildings which have significant historical or architecural value should be preserved. However, we feel these should be chosen with careful consideration and that there should

● *MAIN OFFICE*
41 VAN NESS AVENUE • SAN FRANCISCO, CA 94102
(415) 861-1930 • (415) 861-4507

● *BRANCH OFFICE*
1207 NINTH AVENUE • SAN FRANCISCO, CA 94122
(415) 861-5834

be legitimate purpose and criteria for so classifying any building. **H.1.2**

We urge that you reconsider adoption of the plan as proposed and that criteria be set to preserve buildings which indeed have something to offer by their preservation. **H.1.2**

Very truly yours,

John F. Malley
Secretary
Board of Directors

JFM:dml

Rec'd 4/26/84
@ public hearing

TESTIMONY OF THE

SAN FRANCISCO WOMEN LAWYERS ALLIANCE

BEFORE THE

SAN FRANCISCO PLANNING COMMISSION

CONCERNING THE

DOWNTOWN PLAN

April 26, 1984

Z.2.2

Prepared by:

Childcare Committee
San Francisco Women
Lawyers Alliance
One Market Plaza
Spear Street Tower, 39th Floor
San Francisco, California 94105

My name is Eric Landis-Brenman.

I am a member of the Childcare Committee of the San Francisco Women Lawyers Alliance, a group of women lawyers and related professionals. I am also one of an estimated 92,400 downtown workers who are parents. One of the goals of Alliance members is to use their legal skills to advance the interests of parents who live and work in San Francisco. The Alliance has identified childcare as one of the pressing issues, if not the most pressing issue, confronting parents today. **Z.1**

The Alliance is appearing before you today to address what it considers a critical omission from the proposed Downtown Plan and the draft Environmental Impact Report: the need of working parents in the downtown district for high quality and affordable childcare services. While the Downtown Plan articulates important policies for the provision of housing to mitigate the impact of increased employment, neither the Plan nor the Environmental Impact Report takes into account the substantial impact that the City's projected economic growth will have on an already inadequate supply of childcare services. **Z.2**

Dramatic changes in the structure of the national workforce have elevated childcare to a serious economic issue affecting most American families. The need for childcare, in fact, crosses all economic, educational and social boundaries. **Z.2**

Statistics compiled during recent census reports and surveys illustrate the factors behind the increasing need for childcare. In the United States, fully 46% of the workforce is made up of working mothers with children under 6.[1] In the Bay Area, more than 50% of mothers with children age 6 and under work;[2] and in San Francisco, **Z.1**
parents comprise about one-third of the work force.[3] **Z.2**

A recently released survey conducted by the California Childcare Resource and Referral Network[4] has projected that the number of children 9 and under in the Bay Area needing childcare will increase to over 128,000 by 1985. In San Francisco alone, over 23,200 children 9 and under will require childcare, of whom only about 13,200 will find spaces. The shortage of childcare services is especially acute in downtown San Francisco where only one facility currently exists, at Golden Gate University. Z.1 Z.2

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[1] U. S. Bureau of Labor Statistics. *See Child Care Information Kit*.

[2] The five-county survey conducted by the California Child Care Resource and Referral Network released on March 22, 1984.

[3] "Growth Management Alternatives for Downtown San Francisco," a consultant's report.

[4] *See* fn. 2.

The current Downtown Plan projects that by the year 2000, there will be an additional 100,000 new downtown workers in San Francisco. Yet nowhere in the Current Downtown Plan is there to be found any land use policy designed to accommodate the increased demand for childcare that such a growth in employment will surely generate. In fact, the draft Environmental Impact Report indicates that by the year 2000, the space available for cultural, educational, institutional and the non-commercial uses -- space that could be allocated for child-care facilities -- will decline by 10%.[5] In light of the statistics documenting the already severe shortage of childcare services in San Francisco, it is imperative that the San Francisco Planning Commission act now to ensure that the childcare needs generated by San Francisco's employment growth are adequately accounted for in the Downtown Plan. It is the Alliance's belief that the projected need for childcare services must be included as an integral component of the Downtown Plan's and Environmental Impact Report's forecasts for employment, land use and real estate development in downtown San Francisco. A.1 Z.1 Z.2

---

[5] See Draft Environmental Impact Report: The Downtown Plan, Vol. I at p. I.B.2, Fable I.B.1.

As a concrete agenda toward the provision of affordable, quality child care facilities in downtown San Francisco, the Alliance proposes the following recommendations to the Planning Commission: **Z.1** **Z.2**

1. Adopt policies and incentives that would facilitate and encourage the inclusion of quality, affordable child care facilities in downtown developments -- existing, newly built or renovated. Because a childcare center cannot compete on an economic level with office/retail tenants, leases for childcare centers must provide for: **Z.1** **Z.2**

   a. complete rent subsidy;
   b. a ceiling on operating costs;
   c. adjacent outdoor space;
   d. compliance with all applicable licensing requirements; and
   e. a minimum 20 year term.

2. Adopt policies and procedures to facilitate the flow of information to concerned groups such as the Alliance regarding proposed developments or renovations so that these groups may contact the developers/renovators regarding the need and incentives for including child care centers in such development. **Z.1** **Z.2**

3. Adopt other policies favoring the provision of childcare services that would mitigate the impact of increased employment resulting from downtown development. Z.1 Z.2

To our knowledge, there are no current plans by the City of San Francisco to alleviate the needs of working parents for quality, affordable childcare by providing downtown childcare facilities. One encouraging prospect, however, is a resolution drafted by the City Planning Department and currently pending before the San Francisco Board of Supervisors concerning the exclusion of space allocated for childcare facilities from the FAR in the downtown commercial district. The Alliance is strongly in favor of such an initiative. In addition, the Alliance currently has a proposal before the U.S. Postal Service and the Redevelopment Agency for the inclusion of childcare facilities for 48 infants and pre-schoolers in the Postal Service's Rincon Center Developmental Project. The Alliance's proposal, which we are submitting to the Commission with today's testimony, sets forth a specific program for the accomplishment of this objective in accordance with state licensing regulations for childcare facilities, and demonstrates the feasibility of such a project.

We see this proposed Rincon Annex Childcare Center as a step toward alleviating the acute shortage of childcare facilities. More importantly, we think the Rincon Annex Z.1 Z.2

Childcare Center has the potential for attracting nationwide attention as a model of innovative urban planning, combining commercial development with a sensitivity to community needs. By adopting policies designed to encourage the inclusion of childcare services in downtown developments, the Planning Commission will enable other groups to initiate similar projects throughout downtown San Francisco. **Z.1** **Z.2**

We strongly urge that the Commission study the issue of downtown childcare services with a view to its significance for the Downtown Plan. Members of the childcare committee of the San Francisco Women Lawyers Alliance stand ready to assist you in this effort. **Z.1** **Z.2**

April 26, 1984

Planning Commission
City Hall

To The Commissioners:
RE: Downtown EIR

The uprecedented level of growth assumed by the Downtown EIR and advocated by the Downtown Plan, and its affect on the quality of life in San Francisco and the Bay Area, is not reflected in the Reports conclusions. The Report does not reflect either the existing conditions of the urban envionment nor does it accurately report the impact of proposed Downtown growth on the City and the Bay ~~Ar~~ Area. A cursory glance at the EIR tells you something is amiss. The report fails to objectively address such fundamental problems as, Downtown parking, maintaining neighborhoods, low and moderate income housing, earthquake protection and transporotation, The portions of the EIR that do deal with the crucial areas are not up to ~~da~~ date, many of the figures used are from reports three and more years old (among them transportation and housing). And as such make the conclusions drawn inaccurate and misleading. Even so, the EIR makes one pause and ask, "Is this the kind of City we want to live in?". A vision of overcrowded highways and public transportation, expensive housing in overextended overdense neighborhoods, is not a direction that appeals to anyone living and working here. The Report's conclusions are skewed towards the vision of those who would ~~ben~~ benefit most from the proposed growth, Developers and large businesses. A balance between those interests and the interests of San Francisco residents must be struck. The risk of upheaval in long-established nieghborhoods is too great to gloss over or belittle.* **E.1.3**

Instead of dry figures and questionable assumptions that are made in the Report, a careful study, involving neighborhood input, of the effect of this uprecedented level of growth on the quality of life in San Francisco's neighborhoods is necessary to have an accurat picture of the true enviornmental impact of this proposed growth. The growth already allowed by the Commission is straining nieghborhoods all over the City, from the Richmond to the Mission, the Western Additio to Hunter's Point. All neighborhoods have had their quality of life ~~adve~~ adversly affected. **B.4 D.3.1 R S.2 Z.1**

There was an article in the Chronicle Monday April 23rd about a ~~gather~~ gathering of TV executives to kick off the filming of a new TV program in San Francisco. One of the execs mentioned to a reporter. "I've got a Herb Caen piece for you. I was at the corner of Montgomery and Market Streets and I asked six people how to get to Sutter Street. No one knew." Do we want San Francisco to be a 'City of Strangers'? The question your Downtown EIR raises and the question we must ask ourselves is, do we wish San Francisco's nieghborhoods to disappear as we know them? Peoples ties to their neighborhoods in this City are strong. They gain strength from their neighbors and from their family ties. **D.1 Z.1**

* **A.1 B.4 D.2 D.3.1 D.4 E E.1.3 E.2**
E.3.1 E.4.1 K R Z.1

We do not want or need a City of transients, a "Commuter City" that is overcrowded by day and dark and cold and empty and dangerous by night (as the Financial District is now). D.1 Z.1

Importance must be given to presreving the best of what we have, the comfortable smallish scale city that welcomes people and allows all people, old, young, rich and poor to live out their lives safely and with dignity in familiar surroundings. The Downtown EIR must be written with this in mind. The human scale of our City and the people who live here deserve that attention, or we will wake up one day to a place we do not recognize any longer. A re-write of this Report is in order, as well as a re-thinking of the direction the Planning Commission is taking San Francisco. A limit on office building (a yearly cieling on square-foot area) as well as expanding the moratorium and increasing neighborhood and resident input in the planning process is essential to achieving fair and reasonable growth in the City.

A.1
E.6.1
P.1
S.1
S.2
Z.1

Sincerely,

Arthur Perley
736 Fell Street
San Francisco, CA 94117

PART II: COMMENTS

COALITION FOR SAN FRANCISCO NEIGHBORHOODS
P. O. BOX 5882
SAN FRANCISCO, CALIFORNIA 94101

STATEMENT OF ALAN RAZNICK BEFORE THE CITY PLANNING COMMISSION ON THE DOWNTOWN PLAN EIR - April 26, 1984

Our presentation is critical of the Downtown Plan
and Draft EIR. This is because the documents skirt the
major issues. Although understated, they describe the
immediacy of downtown commercial growth. However they A.1
only give us the *hope* for sufficient housing and transit B.4.2
capacity. Such an equation is not acceptable. D.3.1

Yet, despite our opposition, we feel this process D.5 E.2
is valuable. With changes that meaningfully address the E.6
concerns we are raising, we would hope that our endorsement
could be forthcoming. S.1

The Coalition's desire for San Francisco of the year
2000 is a vital city with the kind of economic and social
diversity that have been its hallmark. We envision a city
that is still hospitable to families and offers employment
opportunities in maritime, light industry, and has
a significant support service sector. We envision a city
that has made significant progress in solving its housing A.1
and transportation problems despite continued growth. Z.1

To achieve this vision is to reject some of the underlying assumptions implicit in the Downtown Plan and Draft EIR. Most significantly we do not believe we have an obligation to receive whatever commercial growth is imposed by the private sector. In addition we believe that the residents of San Francisco have an inherent right to livibility and that this right is more significant than the developers' rights to profits.

The next 16 years of downtown commercial growth A.1
present a threat to this city unparalleled since the Z.1
freeway development crisis of the 1960's. The residents
rose up to stop the insanity of freeways through Golden

Gate Park and many of their neighborhoods. The environmental
impacts of the Downtown Plan, as it is presently
conceived, constitutes just as serious a threat and must A.1
be similarly rejected. Z.1

The Draft EIR concedes severe adverse environmental
consequences from projected downtown development. However
the situation appears to be much more alarming. We believe
that the downtown growth rate is understated and that the
liklihood of sufficient housing and transit accomodations
are overstated. For example, the Plan assumes an annual
growth rate within C-3 of 1.5 million sq.ft. for the next
six years, reducing to an annual rate of 840,000 sq. ft.
for the following decade, an average of approximately
1.2 million sq. ft. for the next sixteen years. How
comfortable is such a projection for it suggests a
decrease in the rate of growth. We believe that these
projections understate the current commitments made by
the Commission, and moreso, the number of project
applications currently under review by the Planning
Department. The Draft EIR's projections assume a B.1.1
substantial, almost immediate fall-off in proposed B.1.2
applications once the Downtown Plan is approved. D.3.1 D.3.3.3

We believe that the projections of downtown E.2.1
commercial growth contained in the Downtown Plan and E.2.1.2
Draft EIR are based upon wishful thinking. We request
that the documentation for projected growth both within
and outside the C-3 District be updated and furnished
the public. B.1.1

Because of these uncertainties we don't believe that B.1.2 B.2
it is fair to ask the public to place reliance on the
assumptions that somehow sufficient transit and housing
will materialize. In your future deliberations you
should be considering housing and transit commitments,
not hopeful plans, particularly as the lead times in
adding transit capacity are as long or longer than for

building office buildings. I repeat that the certainty
of downtown growth balanced against the hope of sufficient D.2.2
housing and transit is not an acceptable equation to our D.3.1 D.3.2
members. E.2 E.6

I consequently wish to propose a mitigation measure P.2
designed to respond to the uncertainty of whether sufficient
housing and transit capacity will materialize. I propose
that the rate of commercial development in the greater
downtown area- not just within C-3- be linked to real increases
in housing and transit capacity. Provisions to achieve and
enforce this mitigation measure should be added to the pro-
posed ligislation implementing the Downtown Plan. It is E.6
practical to do this. The methodology exists. P.2

Our proposal would involve the establishment of a
schedule of downtown growth which would be tied to a
schedule of housing development and transit capacity
increases over the next sixteen years. Each year, each
of the schedules would be updated based on the latest
data and the rate of growth during the preceding year.
If the projected rate of housing development or increase
in transit capacity fails to materialize, the rate of
commercial office development in the greater downtown
area would be proportionally reduced. P.2

The need for this mitigation is recognized in the Draft EIR where, at page V.E.1., it states, "If the Plan, or proposals similar in nature or intent, are not followed, the growth rate may need to be slowed as a matter of deliberate public policy." We urge that this concept be taken to its logical conclusion- that if the housing and transportation measures on which the Downtown Plan is predicated are not followed, the growth rate must be slowed. As there is no assurance that sufficient housing or transit capacity will materialize, even in the short run, we ask for these measures now, particularly since the bulk of the proposed downtown growth will occur during the next few years. Waiting five years will be too late. P.2

This suggested approach is preferable to fixed annual limits for it allows expanded commercial development _if_ sufficient supporting infrastructure and adequate mitigation measures are implemented. This approach would restrict such development- and minimize the adverse impacts on our residents- if they are not. Such an approach has the further advantage of securing the political commitment of the development community to securing sufficient housing and transit capacity. The self-interested support of that community could be a powerful force in making sure that necessary mitigation measures are realized. We fear that any other approach, save fixed low annual limits, spells disaster for residents of what is a wonderful city- a wonderful place to live. **P.1 P.2 P.2.4**

Please help us keep it this way.

Received 4/26/84
at public
hearing

779 38th Avenue
San Francisco, CA 94121
April 26, 1984

Mr. Toby Rosenblatt, President
San Francisco City Planning Commission
450 McAlister Street
San Francisco, CA 94102

Dear Mr. Rosenblatt:

I reject the goal of the Downtown Plan that San Francisco should be a financial center and therefore awash with highrise development. There exists no evidence that this goal is a benefit to the residents of San Francisco. The primary goal of the residents of San Francisco is that the city, that is the whole city, be a livable city. The goal of a financial center saturated with highrise buildings is the goal of wealth, made official by a pliant and unaccountable bureaucracy. **A.1**

This proposal, if accepted, will bring us more commuters, more packed-full buses, more shadowed and wind-tunnel like streets, more grid-locked intersections, more air pollution the loss of affordable housing and the destruction of local businesses and jobs. This is not what we want. Clearly this proposal is an environmental deficit for us now and for all future residents of this city. **A.1**
Z.1

Yours truly,

Jane Nurre

St ifornia Business and Transportation Agency

Memorandum

To : Terry Roberts, Manager
State Clearinghouse
1400 Tenth St.
Sacramento, CA. 95814

Date: 26 April, 1984

File : SF-GEN
SCH #84032003
SF000052

From : **DEPARTMENT OF TRANSPORTATION** - 4
Environmental Analysis Branch

Subject: DEIR - San Francisco Downtown Plan

Caltrans has reviewed the above-referenced document and forwards the following comments:

1. The DEIR does not address the impacts of two major Caltrans projects: (1) the approved expansion of the Transbay Transit Terminal, and (2) the relocation of the Peninsula Commute Terminal (PCT) from Fourth and Townsend Streets to a site adjacent to the Transbay Transit Terminal. Both these projects are expected to be completed by the year 1990. **E.2.6**

The PCT relocation will bring the majority of San Francisco-bound commuters within walking distance of their destination, and will provide them convenient interface with other Bay Area Transit lines. **E.2.6**

With our five-year improvement program, we expect the peninsula commute daily ridership to increase from the present 16,000 passengers to 20,000 passengers by the year 1990. This increase in ridership will require an additional seven trains, making a total of 30 trains by the year 1990. We expect to run a total of 50 trains in each direction to carry an expected daily ridership of 100,000 passengers by the year 2000. **E.2.6**

2. Regarding page I.E.6, second paragraph:
The discussion of the transportation demand increase in the Peninsula Corridor mentions the proposed BART extension to the San Francisco Airport as a mitigation measure. However, Caltrain Peninsula Commute Service extension has not been mentioned here even though it has been included in the Mitigations section (V) of the DEIR. To maintain consistency in the DEIR, Caltrain Peninsula Commute Service extension should be included as a mitigation measure in paragraph I.E.6 also. **E.2.6** **E.2.1**

3. Regarding Page IV.B.22:
The DEIR should expand upon the implications of rezoning publicly owned parcels in public use to P (Public) and the restrictions that such rezoning might have on potential positive changes in land use. **A.1**

4. Regarding Page IV.E.9:
The DEIR should mention that Caltrain has excess capacity at the present time. This capacity can be increased simply by adding more cars to each train when the ridership demand warrants in the future. **E.2.7.1**

5. Regarding Page IV.E.21:
The DEIR assumes no physical changes beyond a 5-year plan. This means that the Caltrain extension is not assumed in the demand analysis. It should also mean that no BART extensions are assumed. **E.2.1**

6. Regarding Page IV.E.26:
The DEIR should reflect the recent actions by the San Francisco Board of Supervisors opposing the BART extension to the Airport and supporting the Peninsula Commute Service extension. **E.2.1**

7. Regarding Page IV.H.12:
The name "Transbay Bus Terminal" should be changed to "Transbay Transit Terminal." All references in the DEIR to the terminal should use its correct name. **E.6.2.3**

8. Regarding Pages V.E.13 and 14:
The DEIR implies that Golden Gate Transit operates only on streets adjacent to the Transbay Transit Terminal. This is incorrect as Golden Gate Transit operates also on the bus deck inside the terminal. **E.6.2.3**

Current commute bus operations at the terminal include AC Transit, Golden Gate Transit, Guiton and Greyhound on the elevated bus deck, and Sam Trans and SF Muni in front of the terminal building but off city streets. The DEIR indicates that only AC Transit is within the terminal and Golden Gate Transit and Sam Trans operate on adjacent streets. **E.6.2.3**

9. Regarding Page V.E.14 (Measure 16) and Page V.E.26 (Measure 43):
In addition to a pedestrian bridge over Mission Street, the project to improve and expand the Transbay Transit Terminal now includes a pedestrian bridge over Fremont Street immediately northeast of the Terminal building. The Fremont Street pedestrian bridge was added to the project at the request of the City staff. **E.6.6**

10. Regarding Page V.E.14 (Measure 17):
The proposal to use Market Street for curbside loading of regional bus carriers should consider the impact on the carrier's travel time to downtown (Transbay Transit Terminal) and the impact on downtown traffic operations. Rerouting Sam Trans and Golden Gate service to Market Street would appear to be contrary to the Plan's intent to consolidate commute bus operations within the Transbay Transit Terminal, and would hinder the objective to make transfers between local and regional transit systems convenient. **E.6.2.3**

11. Regarding Page V.E.15 (Measure 19):
The benefits of continuing and improving transit - only lanes on streets serving the Transbay Transit Terminal should be discussed. In particular, the impact on peninsula regional bus service of enhancing transit travel on Second Street between Berry and Mission Streets should be addressed. **E.6.2.4**

12. Regarding Page V.E.24 (Measure 37):
The proposal to encourage the carrying of bicycles on regional transit lines should consider the negative impact of moving bicycles within the congested pedestrian areas of the Transbay Transit Terminal. **E.6.5**

This section should also include a discussion of Caltrans' administration of an active bicycle storage locker program and installation of lockers at Caltrain stations and regional park and ride lots. **E.6.5**

We look forward to reviewing the FEIR. Please send it to:

Mara Melandry
District CEQA Coordinator
Caltrans District 4
P.O. Box 7310
San Francisco, CA. 94120

Please call Ray Duggal at (415) 557-3394 if you have any questions regarding these comments.

Mara Melandry

MARA MELANDRY
District CEQA Coordinator

RKD:mem

cc: F.D. Husum (DOTP)
RHJ, CLS, FCT, GHC, FAB, RWC, WBC, MM, RKD, TCS, Chron, File

Received during
comment period

2572 California Streeet
San Francisco, CA 94115

City Planning Commissioners
City Hall
San Francisco, CA 94102

Dear Commissioners:

I am writing to express my deep dismay regarding the recently
released Downtown Plan Environmental Impact Report. My dissat-
isfaction with the document spans three fronts: the inaccessability **S.1.1**
of the document, scope of the area studied and faulty infor- **S.1.3**
mation contained in it.

As regards the inaccessability to the public of both the EIR and the plan, I must say that I was most annoyed when I first went to the City Planning Dept, to pick up a copy of the Downtown Plan summary and discovered that I had to sign a list before I could obtain a copy. Expressing doubts over this procedure, (it is public information isn't it?) I was told that this was done so that interested parties could be notified of future hearings and documents (namely the EIR). Needless to say, I was never informed of the hearings nor the release of the EIR. After a friend told me of the release of the EIR, I called the City Planning Dept. to request a copy and was told that there weren't any available. It took three more calls to discover that a copy might be available at the Library. Fortunately there was a copy there, but there were two people ahead of me waiting to see it, so I had to
wait almost 2 hours. **S.1.3**

Once I had an opportunity to examine it, I discovered that the
scope of the EIR is surprisingly limited; to study only the area
in question (Van Ness to Washington St to the waterfront to Folsom)
is shortsighted at best. Millions of square feet of new office space
will provide jobs for thousands of workers, only a fraction of whom **B.2.1**
live in San Francisco. Where will these workers live? How will they **D.2.7**
be transported to their new offices? What affect will this plan **D.3.2.3**
have on Oakland, San Rafael and Concord,not to mention San Fran- **E.2**
cisco's own neighborhoods? The EIR never addresses these ques- **E.3.1**
tions in more than a cursory manner, which hardly becomes a plan of **N.3**
this magnitude.

Finally, I wonder if MUNI assisted in making the tranportation calculations. Although I am only a sporadic MUNI rider, I find it hard to believe that the maximum number of people standing on a MUNI bus, at rush hour is only 17. To validate this point, I have attached a survey of the number of people standing on various
bus lines, primarily though not exclusively, at rush hour. **E.2.2**

It is my hope that you, as Commissioners charged with the planning the
City of San Francisco, reject the Downtown Plan because of the in- **S.2**
adequacies of the EIR.

Sincerely yours,

Margie O'Driscoll

Date	Time	Line	No. of People Standing	
4/4/84	8:25 Am	1BX	23	to Financial district
4/4/84	5:15 pm	1BX	27	from Financial district
4/9	8:30 Am	1BX	33	to Financial district
4/9	5:30 pm	1BX	16	from financial district
4/10	4:45 pm	22 Fillmore	31	Mission → Marina
4/11	8:30 Am	1BX	16	to Financial district
4/11	5:35 pm	1BX	32	from Financial district
4/13	5:05 pm	22 Fillmore	18	Mission → Marina
4/14	3:30 pm	1 CA	31	Polk → Richmond
4/16	7:30 Am	1BX	24	to Financial district
4/16	9:00 Am	1CA	32	to Financial district
4/16	3:30 pm	1CA	31	Chinatown → Richmond
4/16	4:15 pm	1BX	0	from Financial district
4/17	8:00 Am	1BX	25	to financial district
4/17	5:20 pm	1BX	30	from financial district
4/17	7:30 Am	1BX	25	to financial district
4/17	4:30 pm	1BX	0	from financial district
4/18	7:15 Am	1BX	26	to financial district
4/18	1:15 pm	47 Van Ness	21	Mission → Civic Center
4/18	8:15 Am	1CA	19	to financial district
4/18	7:45 Am	1BX	23	to financial district
4/18	4:45 pm	1BX	29	from financial district
4/18	6:15 pm	1CA	27	from financial district
4/19	7:30 Am	1BX	26	to financial district
4/19	8:50 Am	1CA	25	to financial district
4/19	4:10 pm	1BX	29	from financial district
4/19	6:30 pm	1CA	23	from financial district

Date	Time	Line	No. of People Standing	
4/20	7:30AM	1BX	29	to financial district
4/20	9:00 AM	1CA	27	to financial district
4/20	4:15 PM	1BX	19	from financial district
4/20	6:30 pm	1CA	21	from financial district
4/20	5:15 pm	22 Fillmore	18	Mission → Marina
4/23	7:10 Am	1BX	24	to financial district
4/23	8:45 Am	1CA	27	to financial district
4/23	5:30 pm	22 Fillmore	15	Mission → Marina
4/23	7:30 Am	1BX	25	to financial district
4/23	9:00 Am	1CA	24	to financial district
4/24	7:45 Am	1BX	16	to financial district
4/24	8:30 Am	1CA	27	to financial district
4/24	4:05 pm	1BX	25	from financial district
4/24	6:05 PM	1CA	27	from financial district
4/26	3:30 pm	47 VanNess	42	Mission → Civic Center

Received 4/26/84
at public hearing

SAN FRANCISCO
BAY CHAPTER
SIERRA CLUB

6014 COLLEGE AVENUE / OAKLAND, CALIFORNIA 94618 / (415) 658-7470

EAST BAY SHORELINE PARK TASK FORCE

Planning Commission
City and County of San Francisco
City Hall
San Francisco, California

To the Planning Commissioners:

RE: Testimony on the San Francisco Downtwon Plan

I am Chair of the Sierra Club's Task Force on the East Bay Shoreline. I work in San Francisco and live in El Cerrito. Thus, I am greatly affected by and have a strong interest in the San Francisco Downtown Plan. I offer the following testimony. **Z.1**

DEMAND FOR REGIONAL PLANNING AND RESPONSIBILITY

I. Regional Impacts Are Extremely Severe, but Inadequately Analyzed.

From the perspective of the East Bay I offer the following:

A. Even under the incredibly low growth rates assumed in the EIR. there would be a 51% increase in C3 district workers who live in the EastBay by the year 2000. **B.1.2 B.2 D.2.3 D.2.5 D.3.2**

B. The EIR assumes a very optimistic 88% increase in East Bay bound BART capacity (1981-2000). But ridership increase out of C3 alone is 89%. Every last bit of new capacity is used up (and then some!) by San Francisco's growth. **B.2 B.2.1 E.2.3 D.3.2**

But what about growth in Oakland, Berkeley, and other areas in the East Bay. What will be the impact of that growth on BART? The EIR claims all the growth in BART's regional capacity belongs to San Francisco! **B.2 B.2.1 E.2.3 D.3.2**

Any analysis must include other growth in its conditions and must include the cost of transit expansion which is nowheere mentioned.

E.1.4.1
E.2.1.2
E.2.3
E.2.7.4
E.6

C. The same situation pertains to freeways. Growth along I-80 I-101 along the Peninsula and in Marin is not taken into account. Again, San Francisco claims regional transportation corridors for itself. Of course, theEIR never looked at impacts on freeways outside San Francisco. It onld did a p.m. peak analysis, even though a.m. peak conditions are most severe at locations outside the City.

E.1.3 E.3.1

Moreover, the p.m. analysis is deficient as well. The philosophy seems to be that the impacts stop at the San Francisco City limits.

E.3.1

I-80 is already jammed every day from 4-6p.m. in the East Bay, but that isn't mentioned. Nor are the impacts of future downtwon San Francisco growth on this highway discussed.

E.3.1

II. There Is a Need for a Better Regional Analysis

A. The EIR must include the impacts of other regional growth when looking at impacts of San Francisco growth on the region. San Francisco can no longer get away with claiming all regional transit capacity and transportation corridors as its own. **N.3**

B.2.1 B.2.2 E.2 E.1.1.2 E.1.5 E.1.7 E.3.1

The analysis must look at (1) Conditions today in San Francisco and on regional Corridors; (2) Future conditions with regional growth and no new downtown San Farncisco growth; (3) Future conditions with regional and San Francisco growth. **E.4.3 I.3 N.3**

B.2 D.3.2 E.1.1.2 E.1.5 E.2

In other words, CEQA mandates a cumulative analysis!

E.2.1.3 E.2.3 E.3.1 P.3 S.2

B. The EIR should concretely describe the delays to be expected on transportation corridors, i.e., how much increased commute time into San Francisco and out of San Francisco, and what this commute time will be on average days, light trafficked days and heavy days.

E.1.4.2 E.2.2.3 E.3.1

C. The EIR should show the costs of the necessary and assumed improvements For example, how much additional cost will there be for 88% increase in BART capacity, for HOV lane projected on I-80 and I-580?

E.1.4.1 E.2.1.2 E.2.7 E.3.3

III. Most Important: The San Francisco Planning Commission Must Take Up Its Regional Responsibilities

A. People in the East Bay do not want to pay for San Francisco's housing, tranist, transportatation and pollution problems when they are foisted on us without any regard or concern from San Francisco. We do not want San Francisco's problems exported to us.

B.2
E.1.4.1
E.2.1.2
E.2.7
D.2.5 E.3
D.3.2 D.2.3

B. Just as ABAG wansts each City to build its "fair shore" of housing, each city mustlearn to impose its fair share of growth control to learn to live within the region's limits and its carrying capacity.

D.3.3
D.5.2
F.1.2
I.3
N.3

C. We call for San Francisco to requiredevelopers to pay for regional transit impacts, not just MUni impacts. **E.2.1** **E.2.7.4**

D. We call for San Francisco to impose an annual limits on growth. Even with growth projected in the EIR (840,000 square feet of office capacity per year for 1990-2000), the impacts are tremendous and adverse to the City and region. San Francisco should impose an annual limit of at the most 840,000 square feet a year as is laid out in the EIR. **E.6.1** **P.1**

Submitted by Norman La Force

Chair,

802 Balra Drive
El Cerrito, California 94530

RECEIVED
APR 27 1984
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

Joel Ventresca
Haight Ashbury Neighborhood Council

Testimony before the San Francisco Planning Commission on the Draft Environmental Impact Report on the Downtown Plan

April 26, 1984

My name is Joel Ventresca of 202 Grattan Street, San Francisco, California
94117. I am a Past President of a neighborhood association and have been
a resident of the Haight Ashbury neighborhood for the past 13 years. **Z.1**

Overview

The city's urban programs and development policies have been assaulting
low-income and moderate-income neighborhoods for twenty years and work-
ing with pro-growth business interests to displace and gentrify a large **B.4.2**
part of the city's population. **D.1**

Two neighborhoods, in this process, were literally demolished and looked
like bombed out blocks that existed in European cities after World War
II. **B.4.2**

The city's policies and programs have hastened market forces that **Z.1**
encouraged displacement and gentrification. **B.4.2**

San Francisco has experienced an unprecedented boom in downtown office
building construction and expansion of hospitals and other service
institutions. The acreage occupied by hospitals quadrupled from 46 to 166 ac-
res in a six year period. Between 1965 and 1983 office building con-
struction grew 36 million square feet, that is 70 highrises, by the
end of the century another 24 million square feet can be added under
this plan. This plan promises that growth can follow a pattern similiar **B.1.1**
to the trend since 1965. **B.4.2**

As a result, the labor market and demographic composition of the city **D.1**
is being radically reshaped.

Manhattanization, gentrification, touristification, condo-fication are
all trends that will increase with this plan. Residential units will
continue to be converted to commercial uses. A highly competitive housing
market will become more competitive. Displacement of existing residents
will occur with this plan. All of these trends should be measured,
identified, and explained in the DEIR. **B.4.2**
D.3.1

e are proceeding with a policy of growth at any cost. Developers, in-
vestors, and builders will win. Existing residents lose. An urban elite
will be created and is being created that will exclude many of us in
this room from our existing neighborhoods and from the city. **A.1**
B.4.2
D.3.1

This plan is discriminatory toward existing residents.

Impact on Neighborhoods

How has downtown development impacted upon our neighborhoods? B.4.2

The city is like a calm pool of water. The rock of downtown development has been thrown into the pool of water creating multiple ripples throughout the city's neighborhoods. B.4.2

Let's look at just a few examples of what has occurred.

In the South of Market, 3,710 individuals, 250 families, and 586 small businesses were displaced for the Yerba Buena development. B.4.2

In North Beach, 100 upper-story residential units recently have been converted into offices. One developer paid existing tenants $20,000 a piece to leave a building in order to convert to offices. B.4.2

In the Tenderloin, four huge hotel towers have or will go up. B.4.2

In the Western Addition, 3,954 individuals, 3,178 families, and 1,355
small businesses were displaced by the San Francisco Redevelopment
Agency. Subsidized housing was built, but the resulting units could
at best house no more than a quarter of those displaced, leaving the
neighborhood with less than half the units it had in 1950, before
renewal began. Less than 25% of the 3,177 units which urban renewal
left standing in the Western Addition project area are still occupied
by blacks. Seven empty, sandy blocks in the Western Addition have Z.1
lain bare for almost a decade since the neighborhood was bulldozed. B.4.2

In the Golden Gateway, 188 individuals, 20 families, and 522 small businesses were displaced for highrises. B.4.2

In Hunter's Point, 401 individuals and 766 families were displaced for redevelopment. B.4.2

In Chinatown, 418 residential hotel rooms have been lost since 1980. B.4.2

In the Haight Ashbury, gentrification is occurring. From 1970 to 1980 D.1
blacks reduced their share of the Haight population from 33% to 18% as B.4.2
3,264 of the blacks left, according to the U.S. Census Bureau. D.3.1

Now, let's look at just a few examples of what will occur.

In the South of Market area, three large developments are planned. The B.2.1
$3 billion, 16 million square feet of commercial space Mission Bay Project B.2.2.
which is the largest private development in the city's history. The $1 N.2
billion, 5.4 million gross square feet Yerba Buena Project which includes
several highrises. And the $265 million downtown stadium which would be
the most expensive stadium ever built in the United States.

In the Tenderloin, the city is considering a reclassification of the zoning that would increase residential densities, double height limits, and would result in more single-person dwellings while discouraging the production of family housing. The city also wants to implement a new fire code section, which is required in only one other American city. This change will cost smaller, older residential hotels in the Tenderloin, where most of the city's low cost housing is provided, millions of dollars. This change will cause higher rents and increase displacement of existing residents. **N.2** **B.4.2** **Y.2**

In the Golden Gateway, four apartment towers with 1,196 apartments which have rents ranging from $350 to $1,200 per unit have just changed owners increasing the possibility of higher rents and condominium conversions. **B.4.2**

On Nob Hill, 19 apartment buildings have converted 350 apartments into executive suites for short term rentals to business people and tourists. **B.4.2**

There are other ripples on the pool of water as a result of downtown development.

The port has been undermined by building highrises up to the waterfront which cut off rail and truck transportation systems needed to move cargo in and out of the area. Thousands of blue collar jobs have been destroyed. **E.3.2** **B.4.1**

Several ethnic minorities have been pushed out of the city. For example, of all the major cities in the United States, San Francisco is the only one in which the absolute number of blacks was reduced between 1970 and 1980, their number declined 10.1%. **D.1** **B.4**

Families have fled. The population of children in San Francisco, those under 16 years of age, declined 30% in 10 years between 1970 and 1980. **B.4** **D.1** **D.3.1**

Housing costs will become more and more competitive and more and more San Franciscans will not be able to pay the price. Housing costs in San Francisco, according to some studies, are the highest in the nation. Housing production is extremely low to increase the competition and force more and more San Franciscans out of the city. In 1981 only 492 housing units were added to the housing stock of the city. In 1982 547 housing units were added to the housing stock of the city. **B.4.2** **D.1** **D.2.2** **D.3.1**

Displacement

What will be the demographic characteristics of the future residents of the city? Who will live in the neighborhoods of San Francisco in the year 1990 and 2000? **D.1**

This question needs to be addressed in the DEIR. The 1960, 1970, and 1980 U.S. Census data should be included and projections made for 1990 and 2000. Demographic characteristics of the city's residents for 1960, 1970, 1980, 1990, and 2000 should be included in the DEIR. What has been the trends and changes since the downtown development boom of the 1960s? **D.1**

What will be the race/ethnicity, tenure (number of owners and renters), household composition, and household income of the city's residents in 1990 and 2000? **D.1**

The degree of displacement, that will occur as a result of this plan, needs to be measured, identified, and explained in the DEIR. **B.4.2**

The DEIR admits on page IV.D.79, "there could be effects on the mix and types of residents in San Francisco" if the Downtown Plan is implemented. But no where else in the report do we find out who will be able to live in the city or who will actually live here in 1990 and 2000 if the plan is implemented. **D.1** **D.3.1**

The DEIR ignores the resulting displacement of existing residents if the Downtown Plan is implemented. Low, moderate, and middle income families will be displaced.The report does not even use the word "displacement" once. **B.4.2** **D.3.1**

There will be displacement and the public has a right to know the degree of displacement if this Downtown Plan is implemented. This information should be included in the DEIR.

We are in the midst of great change in the demographics of the city. One quarter of the city's residents in 1975 no longer lived in San Francisco five years later in 1980, according to the U.S. Census Bureau. In otherwords, one quarter of the city's residents in 1980 did not live here in 1975. Significant demographic changes are occurring in the city and the public has a right to know what they are and this information should be included in the DEIR. **D.1**

Alternatives

Two alternatives should be examined in the DEIR that are not currently included in the DEIR.

The no growth alternative should be examined. That is no growth for downtown office, retail, and hotel space. If we froze downtown development, while absorbing what has already been approved, it would give the city time to cope with all the problems that have been generated by downtown development for the past twenty years. **Q.1**

A real slow growth alternative below the scenarios presented as alternatives in the DEIR should be examined. This slow growth alternative would restrict height, bulk, density, and location of highrise buildings in San Francisco. **Q.2**

Conclusion

If the medicine prescribed is more downtown growth at the same rate of the last 16 years for the next 16 years, as offered by this plan and

DEIR, the patient I believe will become sicker.

We have to come to terms with the idea that if the medicine isn't working, it is time to stop taking the medicine. **Z.1**

We need to deal with the problems that currently exist as a result of unlimited downtown growth for 16 years. We do not need to worsen our urban difficulties by allowing the rate of downtown development to continue at the same rate. **Q.1** **Q.2**

RECEIVED
MAY 1 - 1984
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

1820 Vallejo St., #102
San Francisco, CA 94123
April 30, 1984

Department of City Planning
450 McAllister St.
San Francisco, CA 94102

Re: The Downtown Plan and EIR

Dear Sir or Madam:

The Plan allows excessive office growth—22 million square feet downtown in the next 16 years. It does not deal with the street congestion and transit crowding that will result if money is not available for massive new transportation projects. It's unlikely that money will be available in anywhere near the amounts needed. E.2.1.2 E.2.7 E.6

While this growth may be helpful to a few San Franciscans, the bulk of the residents, voters, and others who already work here will be worse off with more Manhattanization of the City. A.1 Z.1

Sincerely yours,

Lawrence Maxwell

Lawrence Maxwell

185 Carolina St.
San Francisco CA 94107
May 2, 1984

Dept. of City Planning
Downtown Plan EIR.
450 McAllister St.
San Francisco, CA 94102

Dear Sir:

I am a student at Lowell High School. I was born in San Francisco + have lived here all of my life on Potrero Hill. **Z.1**

I am concerned that the large increase in office space without an adequate increase in housing will force housing prices up beyond the price an average working person can pay. I have had 2 good teachers who love this area leave, with their families, for jobs in other towns because they could not afford to buy a home here. **B.4.1** **D.3.1**

The Downtown Plan EIR should look at the long term effect of excessive office development in San Francisco and what it will do to the cost of owning a home for the average family. **D.4**

When I finish my education + start working I would like to know I will be able to afford to buy a home + raise a family in San Francisco where I was born + raised. **D.4**

Sincerely,

Christopher Borz

SAN FRANCISCANS FOR REASONABLE GROWTH
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San Francisco City Planning Commission
Room 282 City Hall
San Francisco, Ca.   May 3, 1984

RE: Comments on Downtown Plan DEIR (EE81.3)
Seismic Safety and Related Matters

Honorable Commissioners:

Attached, please find formal comments on this critical Z.1
document.

I believe this to be the most important testimony I have
ever prepared in my 10+ year involvement with public planning Z.1
issues.

This testimony, at a minimum, presents the gravest possible
challenge to the adequacy of the Downtown Plan and its DEIR. Z.1

But the implications of the information on earthquake
dangers it contains in addition to that in the DEIR also
hold grave consequences, not just for the safety of thousands
of human beings - if that is not enough - but also for
massive civil liability for the City and possibly individual K.4
officials. K.8

I urge you to refer this testimony not just to your
EIR legal counsel, but to the City Attorney as well who should
evaluate its liability implications. K.8

With this information, you have been forewarned, and all
subsequent actions will be viewed on whether you have observed
adequate prudence in acting upon this and other information K.8
regarding earthquake dangers.

At a minimum, SFRG believes the present downtown "moratorium"
must be extenced as long as necessary until all major mitigtion
measures regrading seismic safety are fully implemented. K.6

Sincerely,

John Elberling

K. SEISMIC SAFETY IV.K.1-18; V.K.1-4; VI.1-2

What the Downtown Plan EIR Admits

This section presents perhaps the most powerful findings of the DTPDEIR. Z.1

"... another great earthquake can occur ... in the next several decades" (equal to the 8.3 Richter Scale magnitude of the 1906 San Francisco earthquake). "Several small and moderate earthquakes ... may also be expected to affect downtown." Z.1

"'B'-rated (violent) groundshaking would occur ... in the eastern third of Subarea 1 and the northeaster third of Subarea 2." (the location of the original Yerba Buena Cove, now filled land and the site of the City's Financial District and the Downtown Plan's proposed expansion zone). "'Violent' groundshaking would cause general collapse of moderately strong brick and frame buildings, serious cracking of stronger buildings, ... lateral displacement of streets, ... and ground fissuring. Properly founded steel-framed buildings ... would suffer the least damage ..." "'Very strong' (C) groundshaking would occur in all of Subarea 4 ..." (Civic Center). The central parts of Subareas 1 and 2, which would also receive very strong groundshaking, are underlain by unconsolidated sands and clays." Z.1

"It should be noted that, in an earthquake of the magnitude of the 1906 earthquake, 'virtually every building [in San Francisco] would be expected to have some damage visible to a trained observor'. In addition, groundshaking resulting from large or moderate (Richter magnitude 5.5-8.5) earthquakes in the vicinity of the City could topple unattached interior objects, such as bookcases and furniture, and break or dislodge some windows, exterior panels, or cornices. Toppling interior objects could injure workers inside existing buildings; falling windows and facade material would be a hazard to pedestrians and vehicular traffic." Z.1

"All but the westernmost edge of Subareas 1 and 2 are mapped as susceptible to liquefaction and subsidence." "If liquefaction or rapid subsidence were to occur downtown, buildings could settle and crack, and water mains, pipes, and underground utilities could break, leaving portions of the affected area without water, power, or telephone services. Elevators could be made inoperable because of loss of power or damage to the elevator system. Local streets could buckle or crack from lateral landsliding that might accompany liquifaction or rapid subsidence." Z.1

"Subsidence and liquifaction resulting from seismic shaking, as well as the shaking itself, would also affect ... highways, bridges, utilities, and piers. Some roads ... may become impassable ... In the event of a 1906-magnitude earthquake, the San Francisco Bay Bridge is projected to be closed for over three days ..." (de to) "possible failure of the elevated approach structures in San Francisco. The Golden Gate Bridge would also be closed because of impassable approaches. The downtown freeway system ... would also be closed for over three days because of ground failure." Z.1

"Communication systems within San Francisco would be at or under 25% of full system effectiveness for over three days after a major earthquake ..." Z.1

"San Francisco maintains an Office of Emergency Services casualty care) "are expected to be on duty within three to twelve hours after an earthquake, though some of these people would be unable to get to their posts because of disruption of transportation facilities and injuries." Z.1

"The City has no general policy or plans to evacuate people from downtown to other areas during and earthquake ..." (except) "... residents of the Tenderloin ... and Chinatown ..." Z.1

"The time of day of an earthquake could greatly affect the number of casualties downtown by affecting the number of people in downtown, and the number of people outdoors who could be struck by falling glass and debris." "The ratio" (of deaths) "for congested areas such as downtown San Francisco is estimated at about 500 people per 100,000" (for an earthquake of Richter magnitude 8+ at 2:30 PM). This is equvilent to a death toll now of more than 1,500 people downtown with the present daytime population of 300,000 or more. "The primary cause for the projected higherfatality rate in downtown during working hours are falling parapets, glass, and cladding, ,the concentration of people on the streets and sidewalks, the potential for damage or collapse of older structures, and the inability of medical teams to reach parts of the area because of fallen glass and debris" (emphasis added). Z.1

"Taller buildings would pose greater seismic hazards than lower buildings of similar design and construction, because of greater swaying motion and surface material available for displacement" (emphasis added). Z.1

"... it should be noted that '... the sole reliance building codes, without judgement [for estimating of damage], will lead to erroneous results, normally underestimating casualties and dollar losses ... ... Surprises have occurred in every destructive earthquake ...'" (citing a federal agency report of 1972). "Responses of buildings designed to San Francisco's Bulding Code Standards to an earthquake of magnitude 8.0 or greater on the Richter Scale is not known" (emphasis added). Z.1

The new Uniform Building Code adopted by the San Francisco Board of Supervisors in December of 1983 did not include several amendments: "revising the method for calculating earthquake lateral forces to more closely fit the shaking characteristics, or periods, of certain types of buildings than methods presented in the UBC, strengthening requirements for corner column design, adding restrictions to reinforced-concrete frame buildings, considering the impact of cladding, if any, on modelling seismic safety of buildings, and other technical revisions" (emphasis added). Z.1

The City Bulding Code is designed to confine earthquake damage in a major earthquake (Richter 7.0 to 8.3) that still "allows for design and construction of buildings from which considerable amounts of cladding and glass could fall to the streets. These falling debris could result in injury or death to pedestrians on the streets below" (emphasis added). Z.1

The proposed Downtown Plan would add 41,000 workers to the C-3 District by 1990, mostly in the very dangerous Subarea 1, which would imply an additional 200+ deaths given a 2:30 PM major earthquake, but "the greater surface area of new buildings would increase the amount of siding materials available to fall on the street ... would add to the already substantial hazards from falling objects." Z.1

By the year 2000 another 49,600 workers are projected to be added to the C-3 District by the Downtown Plan, which would imply a further addition of 250+ deaths. "... any increase in growth, including growth projected for the Plan, would add to an already dangerous situation in a major earthquake." Z.1

The most stunning admission of earthquake danger is contained in the legally required portion of the EIR titled: Significant Environmental Effects Which Cannot Be Avoided If The Proposed Project Is Implemented (Section VI). Z.1

"The project would have a significant seismic safety impact, as it would accomodate higher population densities in larger buildings subject to substantial damage during a major earthquake, particularly in areas of unstable soils in Subareas 1 and 2 ... Accomodation of this growth is being proposed, notwithstanding this impact, because social and eonomic considerations dictate against ignoring market forces for growth Z.1

What the Downtown Plan DEIR Avoids

1. FIRE

There is no discussion whatsoever of the consequences of any fire that might be associated with a major or moderate earthquake. Given the events of 1906, this is not an insignificant possibility, and in fact its ommission is fantastic K.2 and bizarre.

There are several potential levels of fire impact resulting from an earthquake. The minimal level would be isolated fires in separated buildings, including one or more simultaneous high-rise fires, as well as fires erupting due to broken natural gas lines. The second level would be an increased number of such fires that exceed the City Fire Department's available resources to combat at one time, given whatever resources it can effectively deploy accounting for damage to streets, highways, etc. The third level would be a general conflagration, that is, a fire beyond any early control engulfing whole City blocks at one time. K.2

The danger of broken gas mains is not noted. The State Department of Conservation noted in its 1982 report, "Earthquake Planning Scenario," that "innumerable breaks in mains and individual service connections within the distribution systems, particularly in the areas of intense shaking and/or structurally poor ground nearer the Bay margins" (i.e., Subareas 1 and 2) would result in "sporadically distributed fires" that "should be expected at the sites of a samll percentage of ruptures." (page K.2 26).

The loss of water pressure - including most building sprinkler systems - due to broken water mains is not noted. The particular vulnerability to fire of people trapped in high-rise elevators due to power failures is not noted. The health danger posed by widespread buring of toxic materials and hazardous chemicals (including PCB?) is not noted, both with regard to immediate danger and the very possible long-term health/disease K.2 consequences.

2. FLOODING

While it might be reasonably assumed that the BART Transbay Tube (although this matter is also not addressed) will not be breached due to design safeguards, that is not the only way the BART/MUNI subway, which lies beneath the water table/sea level under Market St., could become flooded. Extensive ground failures near the Embarcadero may be possible that would permit flooding of a damaged Embarcadero Station, an thereby the entire subway K.3 as far as Civic Center (and the Tube?). This area experienced very serious such ground failures in 1906 - see copy of Plate 3 from the U.S. Geologic Survey Paper 993, "Historic Ground Failures in Northern Califorian Associated With Earthquakes," attached). Moreover the Downtown Plan proposes MUNI subway expansion in this same area under the Embarcadero and nearby for some distance (the Metro turnaround, E Line, etc.). These new facilities will offer further opportunity for such flooding resulting from ground failure and tunnel cracking if not structural failure which could impact the entire subway system. One key issue in this regard is the integrity of the Embarcadero Sea Wall, now about 100 years old, under major earthquake conditions. Even one stretch of major failure (slumping, etc.) in this area will greatly increase flooding danger for the subway system. What studies/information exist regarding the Sea Wall's seismic performance characteristics? **K.1** **K.3**

If the flooding is rapid, it could cause an extremely large loss of life of people trapped in MUNI streetcars and BART cars, if not those waiting on station plateforms. There is no discussion of this major concern. At rush hour several thousand could be trapped and drowned here alone. **K.3**

A second possible seismic impact would be the creation of a "seiche" on San Francisco Bay. As noted in a recent federal agency analysis, this may cause a series of waves that could flood the streets near the mbarcadero, presenting a danger to those fleeing there to escape the acknowledged dangers within the high-rise area adjacent to it. **K.3**

3. Breakdown of Emergency Services

While the DEIR notes several times that earthquake damage will limit the speed with which emergency services can be activated, this critical issue deserves full evaluation that may indicate additional needed mitigation measures. The fact that many off-duty emergency service personnel, including a substantial portion of the Police and Fire Departments, will be at their homes outside of San Francisco and unable to travel to San Francisco for days after a major earthquake is not noted. This important information can be estimated from available City personnel data. **K.5**

4. Relevant Information About "Glass and Claddings"

All glass is not the same, and all types of exterior panels are not the same. And it matters how far something falls. **K.1**

The amount of kinetic energy contained in a falling object, except as affected by aerodynamic forces, is proportional to the height from which it falls. For a concrete or granite exterior panel falling from a 30 story high-rise, one that falls from the 20th floor will have twice the destructive power of one that falls from the 10th floor, and one falling 40 floors, four times as much and so on. **K.1**

When these panels strike the street they will disintegrate explosively with particles of all sizes flying in all directions, much as though a shrapnel bomblet had been detonated. The greater the height of the fall, the greater the veloctiy of the particles that will strike pedestrians trapped in the open, and hence the more severe the resulting injuries. The physics of this disintegraton are complex and depend on the nature of a given material, so the height/injury relationshp is not a 'straight line' function, but the general principal holds and is significant. In brief, shorter buildings mean fewer serious injuries and deaths due to falling objects than taller buildings. K.1

At the present time, such concrete or stone or composite concrete/stone exterior panels are by far the most common type used in high-rise development, and they are the most dangerous. The previously fashionable, but now uncommon, metal exterior mullion used in high-rise curtain wall design presents less danger as a falling object. First, it may be somewhat slowed by aerodynamic forces as it falls, and second, upon striking the ground it will not disintegrate but remain in one piece. Thus only those who are at the point of impact or very, very close would be injured, as opposed to the much larger raidus of high-velocity flying secondary particles from a disintegrated concrete/stone panel. Moreover, there may be less likelihood of such a metal mullion eing detached from a building's exterior during any earthquake since, unlike concrete or stone, it has the ability to be bent or otherwise deformed by the earthquake's energy without necessarily breaking loose. K.1

There is as well a variety of types of glass. Common 'plate' glass used in most high-rise windows will shatter into many, many sharp shards if it should pop out or shatter during an earthquake and fall to the sidewalk. Due to aerodynamic effects, a pane may 'sail' some distance while it falls with its velocity limited, or it may fall with kinetic energy proportional to height just like a concrete panel. The glass shards are extremely dangerous and will cause terrible injuries. K.1

Alternatively, 'safety' glass, such as that used i automobile windshields, is designed to disintegrate into granular particles if broken. If the glass is broken in the window before it falls, such particles present far less danger than plate glass shards when they hit the street below. If the glass does not disintegrate until it strikes the sidewalk will still be dangerous high velocity projectiles, but not as dangerous as sharp glass shards. It is for this reason that such glass is now required for those windows in high-rise buildings, a few on every floor, that are intended to be borken out by firemen in case of the need to ventilate smoke during a fire. This glass is more expensive than plate glass. K.1

A technical discussion of such facts and options is vital to the DEIR since it does acknowledge the grea danger presented by falling exterior materials during a major earthquake. K.1

5. Very Possible "Worst Case Scenarios"

The death rates (and missing injury rates) suggested in the DEIR if an earthquake occurred at 2:30 PM in the afternoon would obviously be significantly exceeded if a major earthquake were to occur during rush hours. Since rush hour periods will total approximately three hours per day each working day, and since there is no presently-known reason to believe that the time of earthquake occurance is not randomly ditributed, there is about an 8.5% chance of a rush-hour earthquake. This certainly is a sufficient factor upon which to base a credible worst case analysis. K.4

As noted in the DEIR, casulty estimates can be uncertain by a "factor of two to three". If so, a worst case might produce a downtown death toll of 6,000 based on other DEIR data, plus the accompanying far greater total of injuries, of which 1,500 deaths or more would be a consequence development as proposed by the Downtown Plan. K.4

And such an estimate still does not include the impact of major fires or a conflagration, or a major single failure such as the rapid flooding of the BART/MUNI subway or a single high-rise structural collapse. K.4

THERE IS NO INFORMATION THAT MUST BE PROVIDED PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT THAT IS MORE IMPORTANT THAN THE FULL AND HONEST DISCLOSURE OF THE IMPACTS OF A TREMENDOUSLY SIGNIFICANT PROJECT SUCH AS THE DOWNTOWN PLAN IN INCREASING THE DANGER TO PUBLIC LIFE AND SAFETY DUE TO THE INEVITABLE MAJOR EARTHQUAKE THAT WILL ONE DAY AGAIN STRIKE SAN FRANCISCO. K.4

6. How Many Injuries? - The Terrible Details

While some estimates for the rates of the number of deaths are suggested (and even these are not made clear in terms of overall death toll ranges anticipated), the DEIR has absolutely no information of the number of non-fatal injuries expected. In fact, there will be far more injured than killed, and this information is of the greatest public significance in the proper public review of the Downtown Plan and Alternatives, and associated Mitigation measures. K.4

The DEIR appropriately points out the critical impact of the time of the occurance of the earthquake. A major earthquake in the early morning hours, such as 3:00 AM would certianly produece the fewest casulaties, while a rush-hour earthquke at 5:00 would be the worst case. The DEIR present only an estimate for a 2:30 PM workday event. K.4

This underplays the full danger in a legally inadequate manner for an issue affecting human life and safety. Instead, a table should be provided showing estimated deaths and injuries resulting from a major earthquake at significant representative times: early morning (like 1906), mid-day workday, mid-day weekend/holiday, and rush hour workday. Augmenting additional death and injury estimates reflecting possible worst case events as referenced above should be presented as well. **K.4**

In addition, EIR must include a general description of the types of ijuries anticipated: major traumas (broken limbs, internal injuries, severe bleeding comparable to serious automobile accidents), blinding, permanent cripling, loss of limbs, etc. Hiding these unpleasant truths from the public would be an unethical abuse of the planning process of which this EIR is a part. **K.4**

7. Construction Period Dangers

Whatever year a major earthquake actually strikes San Francisco, it is reasonble to assume that there will be several major commerical buildings under construction in the C3 Districts, including several high-rises, if the Downtown Plan is adopted. **K.1**

Such buildings under constuction are especially vulnerable to earthquake impacts. **K.1**

First of all, building materials and supplies, inlcuding hazardous chemicals, may well be temporarily stored at upper levels of the structure but not secured strongly enough to keep from being dislodged, possibly falling to the ground, during the severe swaying motion high-rise structures encounter in a major seismic event. **K.1**

Second of all, some exterior panels in the process of being attached to the tower may be only temporarily secured and therefore also fall to the ground. **K.1**

Third, the cranes used for the erection of large structures may not be stronly enough attached to withstand violent swaying, or may be in the process of being moved and thus easily dislodged. Such large cranes could topple from the building, either to the ground below, or possibly striking adjacent buildings eitherat roof level or crashing into occupied upper floors. **K.1**

Since the DEIR does address construction period impacts on traffic, employment, etc., it must address comparable seismic impacts. **K.1**

Moreover, the construction workers on such projects, if the earthquake occurs during working hours, will be in an extraordinarily hazardous situation. Untethered workers on structural steel beams or decking could be thrown off their feet by violent swaying, with many falling to their deaths. Poorly secured materials, noted above, could crush other workers. Temporary 'man lift' elevators would probably be rendered inoperable, completely trapping others above levels where stairs have been installed. **K.1**

8. Historic Data on C3 District Ground Failures

The aforementioned Geologic Survey Paper documents severe 1906 ground failures in Subareas 1 and 2, as well as the western South of Market (relevant sections attached to main copy of comments). **K.1**

This information is critical to the adequacy of the EIR, should be summarized in the main text and reprinted in the Appendix. **K.1**

9. Status of Emergency Systems

The lack of readiness of San Francisco's emergency systems that would be critical in the event of a major earthquake is not hoentsly disclosed in the DEIR. **K.5**

The attahced newspaper article from the an Francisco Examiner, dated April 26, is attached and incorporated in these comments. "Are we prepared?" Mayor Feinstein is quoted, "The answer is no." **K.5**

A ~~few~~ full discussion of this critical problem is legally essential for the EIR. **K.5**

The Annual Limit Option

The DTPDEIR proposes the value judgement that "social and economic considerations dictate against ignoring market forces for growth", which it thereby alleges justifies the "accomodtion for growth" which the Downtown Plan proposes in spite of the admitted and partially identified "sigfnificant seismic safety impact" (Section VI: Unavoidable Significant Effects... emphasis added). K.7

This is a false, misleading, and inadequate statement of the choices facing the San Franciscion City Planning Commission, the San Francisco Board of Supervisors, and ultimately the citizens of the City of San Francisco. K.7

It is a basic tenet of law and society that human life and safety is not to be sacrified, even for "soical and economic considerations", when any reasonable alternative is available. Such an alternative is available for San Francisco, but the information in the DTPDEIR and presented above clearly shows that it is not part of the Downtown Plan as proposed. K.7

San Franciscans for Reaonable Growth states here and will assert at all available opportunities as provided under due process that the following mitigation measures are required as provided under the California Environmental Quality Act for projects, such as the Downtown Plan, which unquestionably will have a significant environmenal impact: K.6

First, the full, expanded list of seismic impact mitigation measures as set forth on pages V.K.1 through V.K.4 needs to implemented as a requirement for any future office development, whether under the status quo, the Downtown Plan, or under any Alternative, in San Francisco. That is, mitigation measures Nos. 1 through 18, plus the following additional mitigation measures: K.6

"19. The San Francisco City Planning Department can contract for professional studies which will test under 'actual' conditions the performance of exterior cladding and glazing materials which have fallen several hundred feet, as would be the case in a major earthquake, in order to identify the least hazardous materials. This information would be used for the revision of the Building Code proposed by mitigation No. 5. This may well require the prohibition of the precast concrete and stone/concrete composite panels that are at present widely used in high-rise design, as well as the use of more expensive types of glass. K.6

"20. The Board of Supervisors can require the retrofitting of existing high-rise buildings with less dangerous exterior materials as determined by mitiation No. 19. K.6

"21. Proposed development height limits can be greatly reduced, which will reduce the danger from falling materials to a definite extent as would be determined by the testing required by mitigation No. 19. K.6

"22. The Board of Supervisors can require by ordinance that all heavy interior furnishings and equipment in high-rise buildings must be bolted down or otherwise firmly secured so that they cannot break loose under the extreme conditions of a major earthquake. K.6

"23. The Board of Supervisors can adopt similar requirments so that all materials and equipment, including cranes, will be firmly secured in buildings, especially high-rise buildings, that are under construction, and require appropriate safety harnesses for exposed construction workers. K.6

"24. The Board of Supervisors can adopt legislations requiring all designated emergency personnel, inlcuding Police, Fire, and emergency services, to reside within walking distance of San Francisco given conditions anticipated to exist after a major earthquake. K.6

"25. The Board of Supervisors can appropriate surplus funds to provide for the construction of a secure centralized emergency operations center, as well as a comprehensive earthquake-proof City-wide emergency communications system. K.6

"26. The Board of Supervisors can appropriate surplus funds for the purchase and stand-by maintenance of emergency transportation systems for City emergency, Police, and Fire personnel immediately after a major earthuake, inlcuding helicopters and boats. This could be arranged to expand the range of 'walking access' required by mitigation No. 24. K.6

"27. Most importantly, the City Planning Commission and the Board of Supervisors can extend the term of the existing "moratorium" on approval of new office developments until mitigations Nos. 1 through 26 are formally enacted and in force." K.6

Second, additional development within the downtown area which is identified in this DEIR as the most dangerous area due to its development density as well as its seismic characteristics needs to be limited to that amount which is the bare minimum essential for San Francisco to maintain its economic vitality and historic character as an international City. This means: K.7

1. "Market forces for growth" are not the appropriate criteria for such a decision. Rather, careful analysis of the employment needs of San Francisco's resident population - that is, the number and types of jobs required for the present resident workforce and longterm unemployed and underemployed - will provide the necessary information for the types and amounts of development that are essential for the City. Such a Labor Pool Analysis as been repeatedly refused by the Department of City Planning. K.7

2. The minimum amount of new office development required for the City's business community's activities that must be located within the City rather than at other regional Bay Area locations is far less than proposed by the Downtown Plan. In SFRG's judgement, this amount is represented by the proposed "Annual Limit" amount of 500,000 gross square feet per year or less, presented in the DTPDEIR as a possible independent "Mitigation" measure. K.7

3. Potential seismic hazards of other Bay Area locations do not outweigh the manifest, identified extreme seismic hazards of downtown San Francisco; rather less dangerous locations for commerical development should be identified and pursued through regional planning processes, as should the other regional environmental considerations cited by the DEIR as working against directing growth from San Francisco to other locations. This concept is fully described as the "Maximum Seismic Safety Alternative" in another part of SFRG's comments on the DTPDEIR. Q.4

REVISION OF "VI. SIGNIFICANT ENVIRONMENTAL IMPACTS WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED."

In order to honestly, truthfully, accurately, and adequately reflect the tremendously increased seismic safety dangers that will be a direct result of the adoption of the Downtown Plan, the thrid and fourth paragraphs of this very important part of the Environmental Impact Report should be revised to read as follows: **K.7**

"The project (the Downtown Plan) would have an extraordinarily significant seismic safety impact, as it would accomodate higher poputlation densities in larger buildings subject to substantial damage during a major earthquake, as well as add an estimated additional 100,000 to the present wrking/visiting population of 300,000 in the City's office/retail district, which from a seismic safety point of view is one of the most dangerous such urban centers in the world, particularly in areas of unstable soils in Subarea 1 and 2 which are proposed for the greatest amount and density of future office development under the Downtown Plan. **K.7**

"Available mitigation measures (the revised, much expanded list as per SFRG DEIR comments) would improve the structural ability of buildings to withstand major seismic events, would lessen the likelihood of dangerous falling objects from new buildings, and if applied retroactively, from existing high-rises as well. Some new development would replace even more hazardous existing structures, thereby reducing some risk. An Annual Limit on office devlopment, if adopted as a mitigation measure, would proportionately reduce the additional risk that the Downtown Plan would add to the already extremely dangerous existing situation. One particular group, construction workers, would encounter extreme peril. But in any event, a major earthquake during working hours would result in several thousand deaths, and more than 10,000 serious injuries in Subareas 1 and 2, and 'worst case' possibilites, which include a rush-hour earthquake, or uncontrollable major post-quake fires, or rapid flooding of the Market Street subway, could greatly increase these casulaty numbers. **K.7**

"Debris, ground failures, and the like would impede the access of fire-fighting and other emergency vehicles. Ruptures of gas lines, power lines, nd water lines due to ground failures in Subareas 1 and 2 may lead to fires which cannot be readily addressed, and might become uncontrollable conflagrations encompassing entire blocks, resulting in far more property damage than the earthquake itself, as was the case in 1906. Building emergency systems, including emergency generators and sprinkler systems, may be rendered inoperable by a major earthquake. **K.7**

"All alternatives, except the "Maximum Seismic Safety Alterative" (part of SFRG's comments on the DEIR) would result in similar exposure of increasing numbers of people to seismic hazards, as eliminating this seismic impact would require redirecting growth to areas of lower density and less seismic hazard.

"Accomodation of growth is being proposed nonethelss by the Downtown Plan, because social and economic considerations dictate against ignoring market forces for growth no matter how many thousands of avoidable human deaths and injuries may very possibly be the consequence of this choice. Some may have to die so that others may prosper; as a matter of equity, the deaths and injuries will be dispersed demographically among all eoncomic levels and ethnic groups, the rich and the poor, corporate executives and secretaries, City residents and commuters, shoppers and tourists, young and old, insofar as they proportionately comprise the downtown population at the time of the inevitable occurance of a major earthquake. **K.7**

"Maximum Safety"

"The ~~"Minimum Risk"~~ alternative would require unprecendented regional planning for new development in the San Francisco Bay Area, or, lacking that, it could result in other negative environmental impacts, regarding regional open space, urban sprawl, transportation impacts, etc." **K.7** **Q.4**

REVISION OF: "VIII. THE RELATIONSHIP BETWEEN LOCAL-SHORT TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY"

In order for the Downtown Plan DEIR to be honest, truthful, accurate, complete, and adequate, the final paragraph of this very significant section should be revised to read as follows: **K.7**

"The proposed Plan would allow higher population densities than presently exist in an already dense area of San Francisco. Such high densities in a major earthquake would lead to increased fatalities from falling building materials, pedestrian massing in roadways and on sidewalks, and obstructions that may delay arrival of medical and rescue teams for hours. These higher densities would also mean more workers who may have have to be accommodated within San Francisco, regardless of their actual place of residence, for the three days after a major earthquake in which the transportation systems may be inoperable. The highest densities are projected to occur in Subareas 1 and 2, and are coupled with poor soil stability hich accentuates seismic hazards. Approval of the project is deemed herein to be justified because it would not allow population densities downtown to be as great as is presently permitted under the Planning Code (Alternative 1), although a safer Maximum Seismic Safety Alternative is acknowledged to exist that is not recommended because it is politically unacceptable to the Planning Department. Restraining the density increase at this time does not theoretically preclude the option of considering this or other alternatives in the future, although as a practical matter this is the only foreseeable such opportunity since there is little likelihood of a new comprehensive downtown plan process repeating this five-year effort until the next century. **K.7**

Revision of IX. SIGNIFICANT IRREVERSIBLE ENVIRONEMTNAL CHANGES WHICH WOULD BE INVOLVED IN THE PROPOSED ACTION SHOULD IT BE IMPLEMENTED

In order for the Downtown Plan EIR to honestly, truthfully, accurately, and adequately describe the extraordinarily significant seismic safety hazards presented by the Downtown Plan, the last sentence of this very important EIR section should be revised to read as follows: **K.7**

"The additional development permitted under the Plan would be in an area of extrem seismic hazard, would significantly increase the number of potential deaths and serious injuries that will result from a major earthquake, and would eliminate the opportunity to develop an alternative regional growth pattern that would greatly reduce future loss of life and injuries throughout the San Francisco Bay Area due to a major earthquake." **K.7**

THE "MAXIMUM SEISMIC SAFETY ALTERNATIVE"

There is a chance for San Francisco and the the Bay Region to avoid a loss of human life, with many more serious injuries, due to a major earthquake that would be unprecedented for a modern urban metropolis. Q.4

There is a certainty that there will be a major earthquake which may well equal the 1906 quake's intensity sometime in likely lifetime of the new development that would be permitted under the proposed Downtown Plan. Some seismologists suggest that there is a 50% chance of such an event in the next 30 years, with the regional location unknoweable at this time. There is hope for the potential of scientific advance warning at some time in the future, although to what degree of specificity no one can now predict. Q.4

Due to the timing involved in the gradual buildup of stress along the San Andreas Fault and associated Hayward and Calaveras Faults, there is a reasonable expectation that there may be some decades before such a major event. If used wisely in conjunction with regionl planning for development, as well as intelligent self-restraint in San Francisco, this 'grace period' (or 'last chance') offers just enough time to refocus development patterns in San Francisco and the Bay Area in a manner that will save perhaps tens of thousands of lives, and avoid several times that number of serious injuries. Q.4

It is terribly unfortunate that historic development patterns have concentrated the greatest humnan working densities at some of the very most seismically dangerous locations in the Bay Region. The San Francisco Finanical/High-Rise District is focused on the one-time location of Yerba Buena Cove, waterfront land filled during the Gold Rush. Downtown Oakland is sited on an alluvial outwash plain and former esturain marsh land. Downtown San Jose, Walnut Creek, and Concord are located on alluvial valley-bottom deposits. Most of the commercial development along Highway 101 on the San Francisco Peninsula is located on filled-in Bay marshlands. Q.4

From a seismic point of view, bedrock is the safest type of location. Except for potential landslides on steep exposures, there is far less potential for ground failures - spreading, settlements, liquifaction. etc. While for most major commerical structures pilings are driven to reach below-surface bedrock, or at least denser deposits of other materials, the surrounding streets, utility systems, etc. have no such protection. Thus while there is some confidence there will be few if any major structural failures of large commercial buildings (with some exceptions) during a major earthquak, they may well be totally isolated after the event, while dangerous fires and hazardous material spills surround them in utiltiy systems and on the street surfaces. Since ground failures and debris may well render the street system impassable to any emergency vehicles, fires can grow into uncontrollable conflagrations, and emergency medical and rescue services may be delayed for hours while injured die due to lack of assistance. Utility and street access systems well designed upon bedrock will be far less susceptible to such damage. Q.4

Lower, less densly packed commercial structures themselves are safer than skyscraper clusters such as the present San Francisco financial district. This results directly from the problem, which is acknowledged in the Downtown Plan DEIR, of exterior cladding material and window panes falling off buildings during a major earthquake. Even if the mitigation is adopted that would require all new buildings to be faced with the least dangerous such exterior materials and glass, as well as the most conservative attachment mechanisms, some will be dislodged due to unforeseeble stresses, building history, material degradation, construction errors, faulty materials or design, vibrational conflict between adjacent structures, special construction period situations, etc., etc. If street level pedestrians are within the impact zone of such falling materials,which includes the effective radius of high velocity secondary particles genereated upon impact, serious casulaties are inevitable - which is why the sidewalks of the City's Financial District are one of the most dangerous places to be during a major earthquake. Retrofitting existing buidlings with 'safer' exterior materials will further reduce this hazard, but it cannot be eliminated. As noted in SFRG's comments elsewhere, all things being equal, lower buildings per se are safer since falling materials then have less potential energy to be released upon impact at ground level that can be translated into the velocity of fragments, shards, etc. which will strike and injury unprotected pedestrians. Q.4

Such considerations do not mandate suburban-style office park development, although that is much safer seismically in this regard. Carefully planned siting of commercial structures in coordination with pedestrian access and circulation systems can remove much potential danger - but not in downtown San Francisco given the existing density of development. Q.4

There are other considerations that would be developed and analyzed in the course of appropriate regional planning that are beyond the scope of this Alternative in this DEIR context. But in essence, the Maximum Seismic Safety Alternative would call for the shifting of Bay Region commerical development, including that envisioned for downtown San Francisco under the Downtown Plan, to locations in bedrock areas accomodating at most mid-rise development. Q.4

There is no question thatthis would require a revolution in the developmental patterns of the Bay Area, but such possible locations do exist. A prime such possible area to absorb the development envisioned for downtown San Francisco, for example, is northern San Mateo County where bedrock reaches to the Bay along the IS 280/US 101 corridors. Q.4

The DEIR notes that there are many environmental consderations that would have to be addressed if there were to be a major reconfiguaration of Bay Area commercial development patterns along these lines. It does not note, but could, that there exists no regional agency at this time with the ability to do that. Urban sprawl is not necessary, and transporation systems can be adapted with future expansions relocated. Such political/bureaucratic shortcomings and solveable environmental problems in regional planning do not justify rejecting the Maximum Seismic Safety Alterative in favor of the much more dangerous present pattern of development, with its associated much greater loss of life and serious injuries during a major earthquake. Instead it highlights the critical need for sound regional planning for the San Francisco Bay Region. The critical significance of the Downtown Plan process is that it can be the first large scale planning effort that starts this vital process, this change of philosophy, and leads the way for other local municipalities and counties as they consider their own developmental options ad priorities. **Q.4**

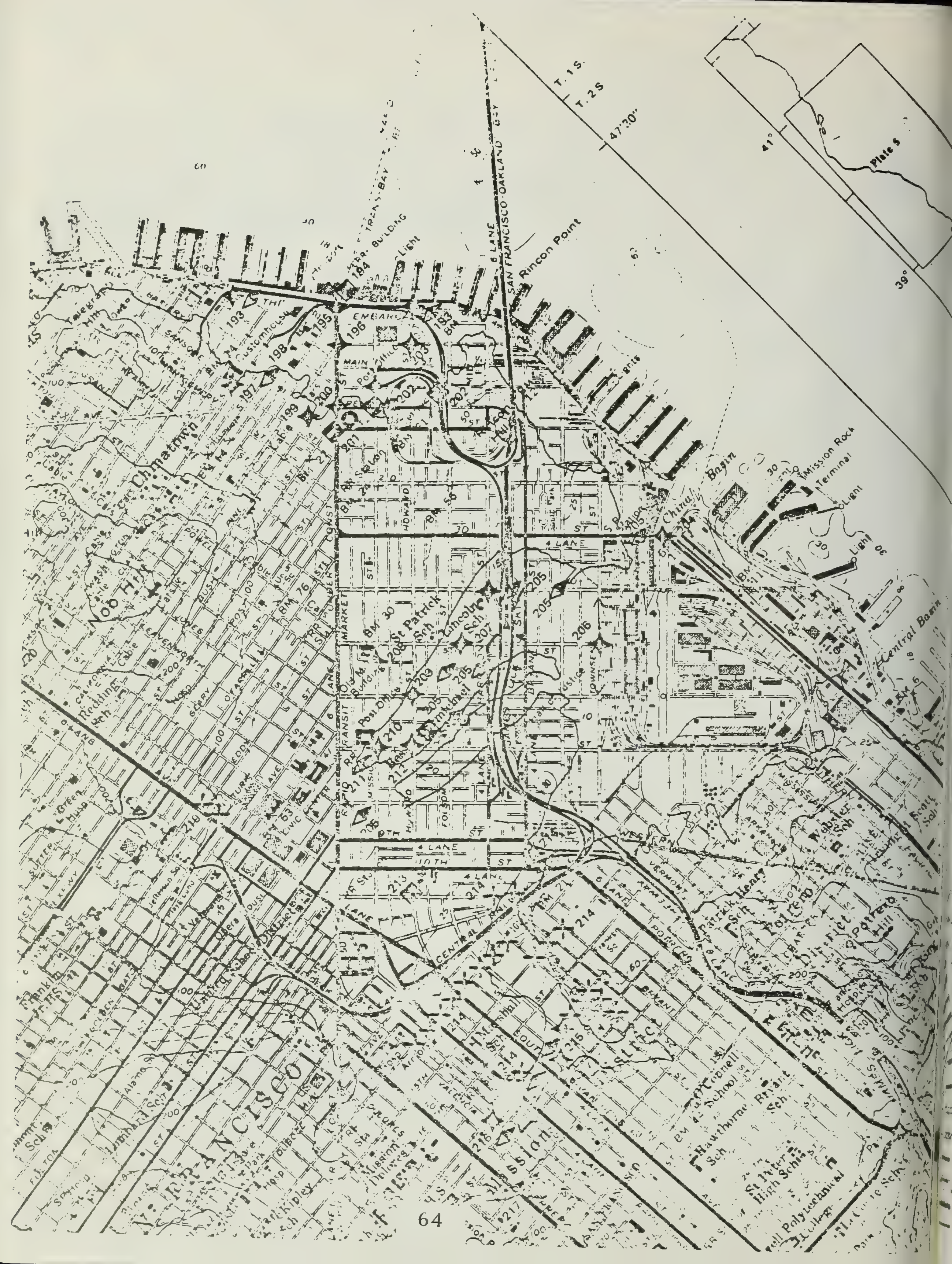
To fail to adopt this alternative is to tacitly embrace the immoral policy that human life is less important than political convenience/inertia and 'market forces' (that is, who makes money under the way things are now). **Q.4**

5.25

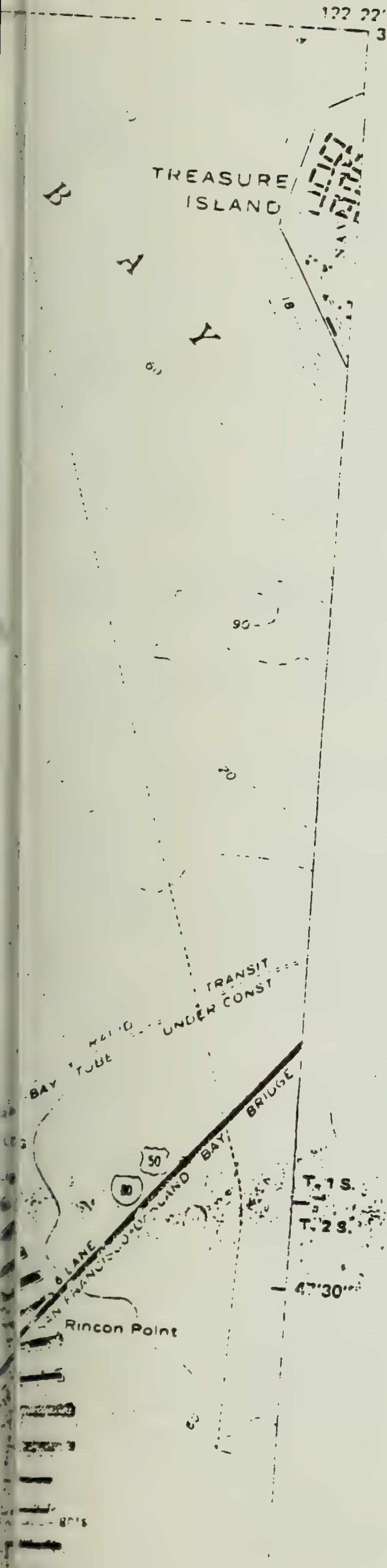
Historic Ground Failures in Northern California Associated with Earthquakes

U S DEPARTMENT OF THE INTERIOR
MARCH 3, 1849

GEOLOGICAL SURVEY
PROFESSIONAL PAPER 993


T. 1 S.
T. 2 S.
47'30"
41°
39°
Plate 5
SAN FRANCISCO-OAKLAND BAY
8 LANE
Rincon Point
FERRY BUILDING
Light
Telegraph Hill
Customhouse
EMBARCADERO
Post Office
Chinatown
Nob Hill
China Basin
Mission Rock
Terminal
Central Basin
St Patrick Sch
Lincoln Sch
Post Office
MARKET ST
4 LANE
10TH ST
Franklin Jr HS
SAN FRANCISCO
MISSION
Potrero District
Potrero Hill
Webster Sch
Patrick Henry Sch
Hawthorne Sch
Bryant Sch
St Peters High School
Polytechnical High School
Mission Dolores

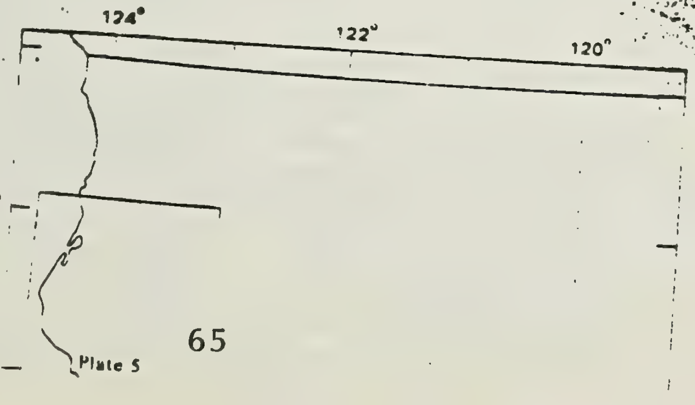
PROFESSIONAL PAPER 993
PLATE 3


122 22'30"
37 50'
TREASURE ISLAND
BAY
90
70
BAY AREA RAPID TRANSIT TUBE UNDER CONST
BAY BRIDGE
SAN FRANCISCO OAKLAND BAY BRIDGE
6 LANE
50
80
T. 1 S.
T. 2 S.
47'30"
Rincon Point

EXPLANATION

Failure type is indicated by the following symbols. Quotations describing these ground failures are found in table 7

◪	Hillside landslides including rotational slumps, block glides, debris avalanches, and rockfalls
◐	Streambank landslides including rotational slumps and soil falls
◆	Lateral spread
⊠	Ground settlement
▬	Ground cracks not clearly associated with landslides lateral spreads, settlement, or primary fault movements
○	Sand boils
☐	Absence of ground failure noted
⊠	Miscellaneous effects
✕	Cracks in streets and pipeline breaks
←◐→	Arrows showing extent of area affected. Symbol shows failure type
195	Location number assigned to each reported ground failure site. Corresponding number found in table 7
——	Old shoreline before development from Nichols and Wright, 1971


124°
122°
120°
41°
Plate 5

[illegible]

[illegible] quake reveals

4/26/84

By Corrie M. Anders and Gerald Adams
Examiner staff writers

In a major earthquake, it would take San Francisco's Office of Emergency Services from three to eight hours to set up full operations to cope with the disaster.

The office would have to move its personnel, charts and equipment nearly a mile, from its clerical offices at Seventh and Market streets to the Central Fire Alarm Station at Hayward playground.

The OES administrative office also lacks a direct line to the national emergency alert system used by all major authorities.

These weaknesses in The City's principal disaster coordinating agency became evident as city officials responded to Tuesday's earthquake, centered 12 miles east of San Jose on the Calaveras Fault.

The tremor did not cause San Francisco to activate its emergency center, although emergency personnel monitored Bay Area activities from their administrative offices.

The City suffered little damage. But Stanford University Professor James Gere said yesterday that San Francisco could have been in considerable trouble if a quake of similar strength had been centered near here.

It would have severely damaged, and even collapsed, some older brick buildings of the type found in Chinatown, said Gere, a structural engineer who specializes in studies of how earthquakes affect buildings.

Newer high-rise buildings would have taken people inside on a swaying, scary ride, but they would have been "quite safe," Gere said.

San Francisco and state emergency officials acknowledged that The City's fragmented offices were less than ideal to handle a major temblor centered in or right near San Francisco.

"That's not a good situation," said Donna Darling, coordinator for the state Office of Emergency Services' Region 2, based in Pleasanton. "It could be better coordinated physically."

In other jurisdictions, Darling said the day-to-day operations are located in their emergency centers and switch to an emergency response system when the need arises.

"We should be located with the city command post," said Philip B. Day, director of the Mayor's Office of Emergency Services. "That's our plan down the road."

If a major earthquake struck while city employees were on the job, it would take three hours for the central emergency office to swing into full operation. It would take about eight hours on a weekend.

"That's the time it takes for people to pull on their socks and start to do business," Day said. "But don't give the impression that nothing is being done for three hours," he said, noting that emergency personnel would be working constantly.

The $40,000-a-year OES director said he felt the response time was "reasonable" for a catastrophic, 1906-style earthquake where "you may have streets blocked and fatalities among our own."

Day said he was not overly concerned he did not have direct access in his administrative office to the National Air Warning Alert System, a connection befitting a nerve and coordinating center. The terminal is located at the command center.

The terminal is monitored around the clock and pertinent information is telephoned to his office. "If we had an extensive disaster," he said, "we'd be over there to receive" the information directly.

Mayor Feinstein said yesterday that the splintered office was "less than optimal." But she said she was more concerned about having a center "that will withstand an earthquake" than its location.

It would cost millions of dollars to expand The City's central emergency facility to accommodate the OES administrative offices and personnel, according to city officials, which apparently is not at the top of priority lists.

"It does seem a shame a city the size of San Francisco can't scrape together the funds needed to put together ... a good facility," Darling said. "We can't convince The City that's a deficit in their planning."

Darling said there are federal funds available, which The City must match, and "coming up with those matching funds is what's holding it up."

Tom Eastham, the mayor's press spokesman, said the federal funding would require The City to also prepare responses to a nuclear attack.

"That became a problem because of the board's action regarding non-participation in planning for a nuclear attack," he said, referring to the Board of Supervisors' view that there would be no survivors in a direct hit and such planning was worthless.

The City conducts full-scale annual earthquake preparedness drills, such as the one held last week. The City's response is improving, according to Feinstein.

"Are we prepared? The answer is no," Feinstein said. "Are we getting better prepared? The answer is, I think we are. It's very hard to sustain preparedness year after year."

Whether there would be widescale, severe damage in an earthquake here would depend both on the magnitude of the temblor and the type of structures affected, according to Gere, who has written a book on how earthquakes affect buildings.

"If we had a 6 (on the Richter scale) earthquake on the San Andreas fault near the Golden Gate, Marin County or Daly City, then you could expect damage in San Francisco to a lot of old, old buildings," he said.

"The dangerous ones are old brick buildings, one to five stories, in areas like Chinatown that are a threat to life and limb. It could cause the worst of them to collapse.

Newer high-rise buildings constructed in the past 20 years "are quite safe and have been designed by engineers who are earthquake conscious," Gere said.

SAN FRANCISCANS FOR REASONABLE GROWTH

~~88 FIRST STREET, ROOM 600 • SAN FRANCISCO, CALIFORNIA 94105 • TELEPHONE: (415) 566-7050~~
241 Barlett St., San Francisco, Ca. 94110

Rc'd fr John Elberling @ hearing 5/3/84

San Francisco City Planning Commission
Room 282 City Hall
San Francisco

May 3, 1984

RE: Comments on Downtown Plan DEIR (EE81.3)
Re: Sections "H" - Urban Design
Visual Impacts Analysis

The evaluation of the visual impacts of the development proposed to be accomodated by the Downtown Plan or its Alternatives is grossly incomplete and and inadequate, and thereby so misleading as to be in effect knowingly false. **H.4**

There are two basic problems, which further interact with each other to compound the failure: **H.4**

1. The major visual impact evaluation, the photomontage IV.H.16, IV.H.17, and the comparable montages for the various alternatives, show only those impacts visible from one direction, the south. **H.4.3**

That montages are the most critical public data is proved by the fact that these are the only visual impact analyses published by the daily press. **H.4.3**

On the other hand, the City's image and skyline as generally perceived by the public at large is the downtown as viewed from the east (the Treasure Island view) and the north. This is evidenced by the predominant choice of these views for commercial reproduction in mass media - see sample postcards attahced. The southern view is rarely if ever used in this regard. The City's international "image" is either the Golden Gate Bridge, the cable car, or the downtown/Bay Bridge view from T.I. To ignore the eastern and northern view is indefensible on these grounds alone. **H.4.3**

Moreover, while the south view is very useful to observe the impacts of a portion of the development at issue, it just as surely fails to observe further impacts that are obscured from that angle but would be visible and very significant seen from both the east and the north. Thus this vital information is denied to the Commission and the general public. **H.4.3**

2. The visual impacts of the proposed "Rincon Hill Plan" are not included in any way in the urban design evaluations. **H.4.3**

This project has been underway at DCP for more than a year. An Administrative DEIR exists; an EE number has been assigned; a preliminary draft plan exists; there have been some hearings on the proposal. Most significantly it proposes major high-rise development for the crest of Rincon Hill, immediately adjacent

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May 3, 1984
EE81.3
Page 2

to the new C30(SD) District proposed by the Downtown Plan. H.4.3 N.2

Therefore, this project while not adopted and proposed only as a permissive zoning change (as is, after all, the Downtown Plan itself) is a reasonably probable project for the purposes of inclusion in cumulative impact analysis under the DPDEIR. To exclude the Rincon Hill Plan from visual impact analysis, given its very significant visual effect, is not just stupid, but dishonest. H.4.3

It is clear from the Preliminary Draft of the Rincon Hill Plan (see portions attahced) that a project model exists which would make incorporation of the project's impact into the DPEIR's photomontages technically simple. H.4.3

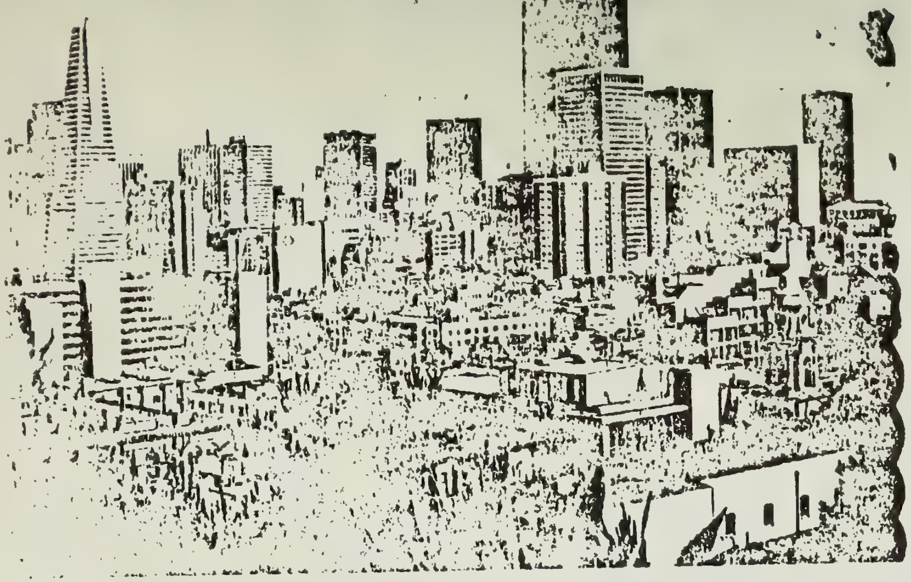
While the south view will definitely show the impacts of the Rincon Hill Plan, the east view would depict even more dramatic impacts. This is because the Downtown Plan and Rincon Hill Plan combined will permit a 200 foot wall of high-rises just one-half block inland from the Embarcadero between Mission Streets and Rincon Hill, with even taller structures further inland, capped by four extraordinarily prominent 30-40 story high-rise condo towers on the crest of Rincon Hill, itself about 100 feet above sea level. H.4.3

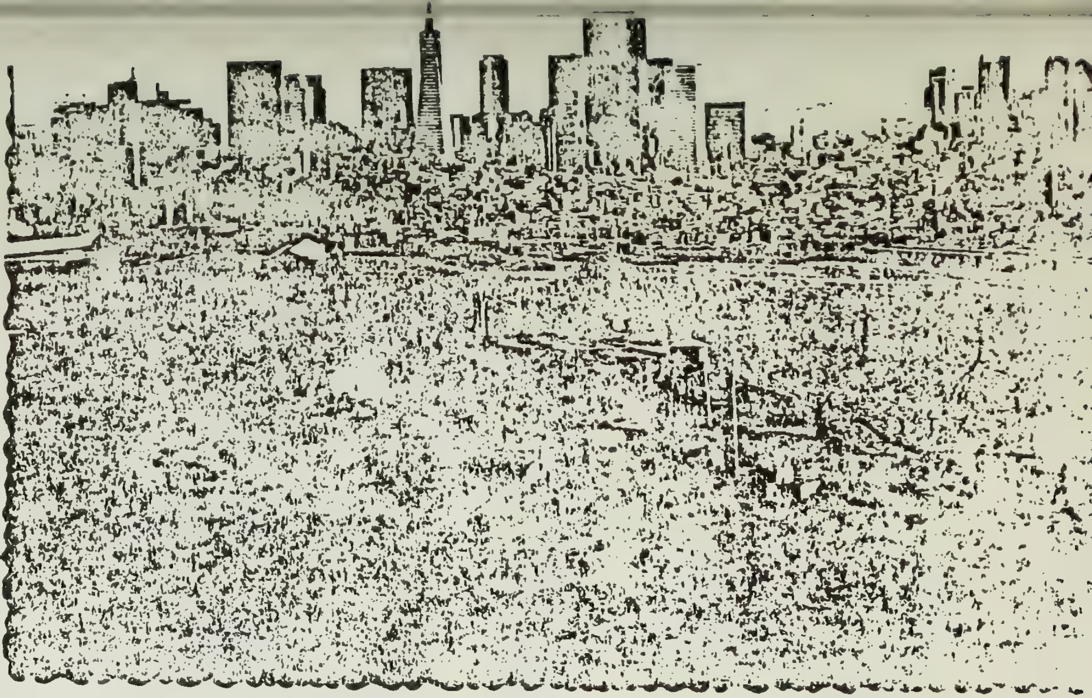
The cumulative impact of these two projects would completely change the City's present east view. The resulting high-rise skyline would be almost double in breadth from that view compared to 1984, and the Rincon Hill towers would provide essentially a new counterpart to the Transamerica Pyramid on the skyline's opposite extremity. The City's Bayward image would assume a much more Chicago or Manhattan-like character compared to its recent past. H.4.3

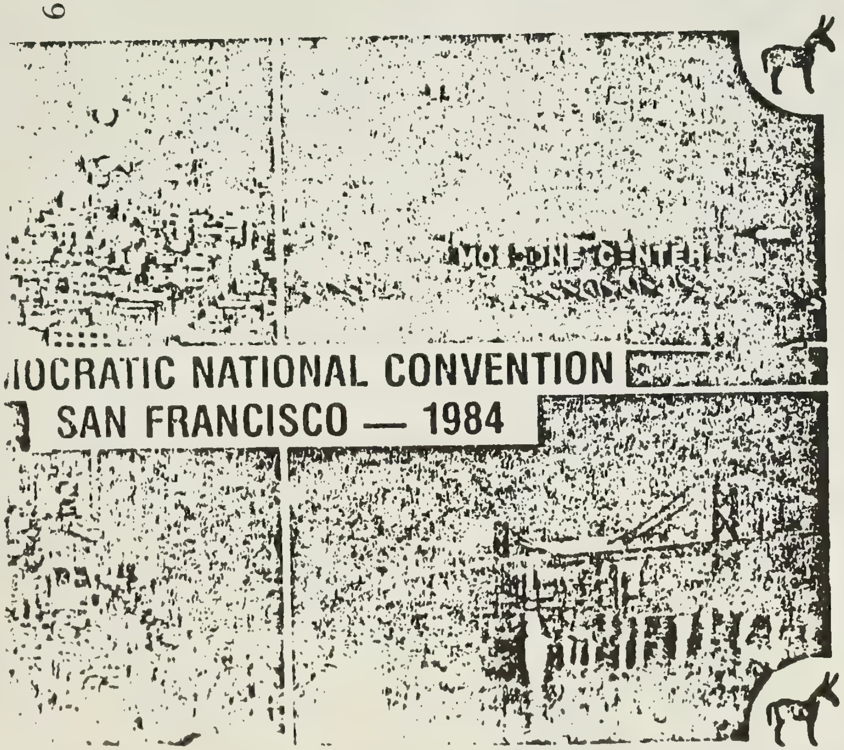
Some may think this is an improvement, others may hate it. But it legally unjustifiable to omit and suppress this total information with regard to the Downtown Plan and its EIR. H.4.3

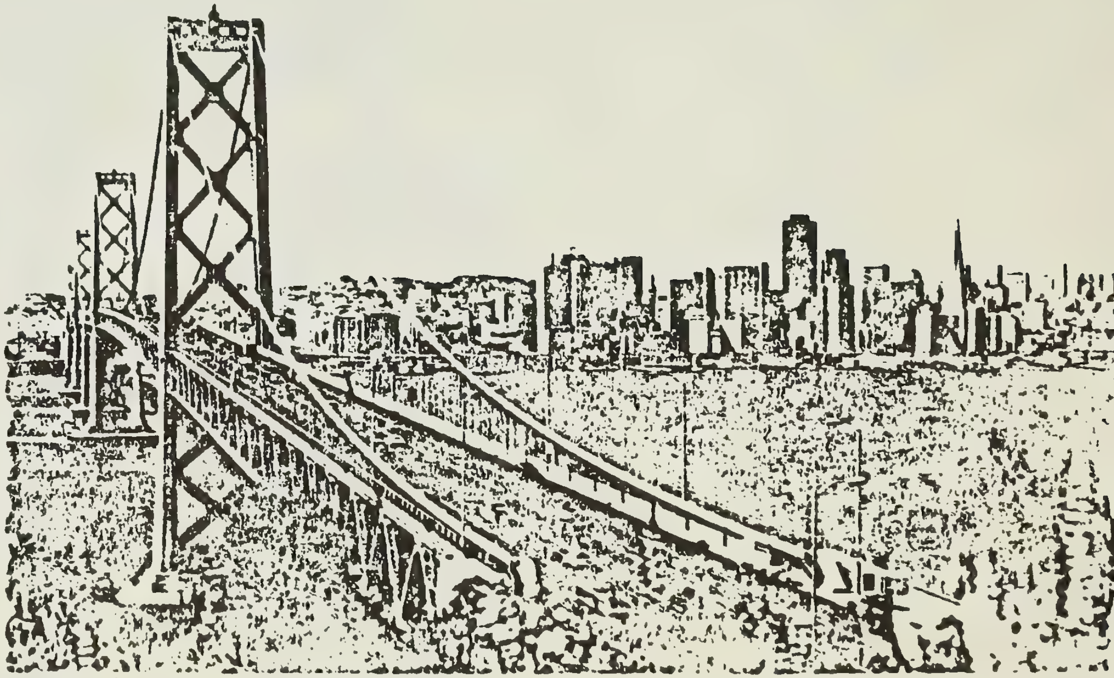
Sincerely,

John Elberling



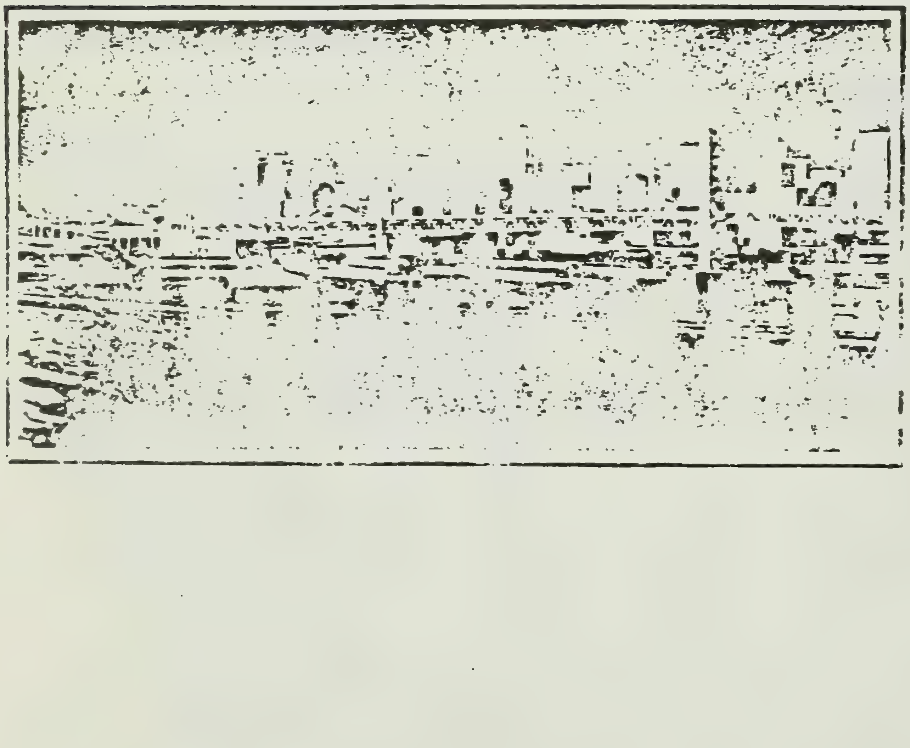



MOSCONE CENTER
IOCRATIC NATIONAL CONVENTION
SAN FRANCISCO — 1984

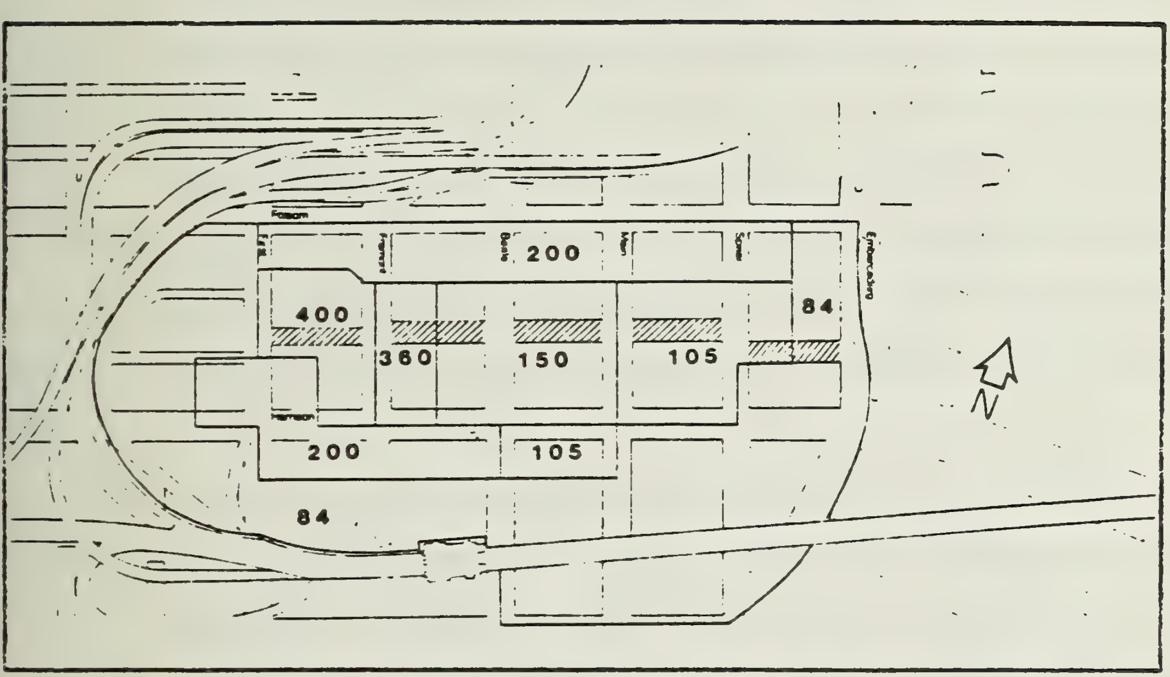


San Francisco Bay Bridge

As previously noted, developers will be permitted to build to the maximum height limits as shown on Map 8 only if the increased development allowed results in greater affordability of the housing. The maximum height limits are 1/5 to 1/3 greater than the basic "as-of-right" height limit controls established for each height zone. (See Map 7) Both of these height maps honor the urban design principles of the Plan. The difference between the maximum allowable height and the proposed lower "as-of-right" height constitutes a density bonus for affordable housing.



PRELIMINARY
SUBJECT TO REVISION


Folsom
Fremont
Beale
Main
Spear
Embarcadero
Harrison
200
400
360
150
105
84
200
105
84
N

MAP 8: MAXIMUM HEIGHT LIMITS

▨ PEDESTRIAN STREET (SEE MAP 9, PUBLICLY ACCESSIBLE OPEN SPACE OPPORTUNITIES)

PRELIMINARY
SUBJECT TO REVISION

Maximum heights are allowed only if a percentage of low and moderate income units are included in new residential development.

①✓

STATEMENT OF HOWARD STRASSNER BEFORE THE CITY PLANNING COMMISSION ON THE DOWNTOWN PLAN EIR, MAY 3, 1984.

Chairman Rosenblatt, members of the Planning Commission, good EVENING ~~morning~~. My name is Howard Strassner. I have been requested by the members of the Coalition of San Francisco Neighborhoods to present their position concerning the Transportation components of the Downtown Plan EIR. Though we deplore separate analysis in, time, space, or component, the short time you allow for comment and our amatuer status compel~~l~~ us to fractionalize our efforts, The Planning Department, however, is required by law to provide an integrated analysis covering the cummulative impacts of a development in all aspects of time, space and components. This you have not adequately done. Z.1 S.1.1 S.1.3

In recent years downtown developmen t has proceeded at a rate which has caused unacceptable impacts to the people of San Francisco. San Francisco residents too often suffer through crush-loading on Metro or buses. Many have to wait for extended periods to even have some ~~T~~transit they can squeeze into. We typically curse the Muni. But these problems are not entirely Muni's fault. The problems were caused by a rate of downtown development which did not provide sufficient time or funds to have the proper mitigations in place before the impacts were imposed. We find that the subject EIR offers us some hope of mitigation in partially funded 5 year plans but only prayers to mitigate against furture impacts. And now any impacts will be imposed on top of an already crush-loaded transit situation. This is unacceptable. E.2.1 E.2.2 E.3.2 E.6

Neighborhood residents who de~~sire~~rive no benefits from the downtown have been impacted and will be further impacted by downtown development if the proper mitigations are not implemented in a timely manner. The Supervisor's transportation sub-committee has heard testimony on the difficulties of senior citizens attempting to cross Van Ness at Broadway and even of the difficulties of younger people crossing 19th Ave. at Holloway. These kinds of problems are a recent development. They are undoubtedly caused by drivers drawn by the increase in downtown office space. ~~Their~~ This conclusion is made more poignant when one considers that the population of the City has been declining and that the per capita use of automobile has also been generally decreasing in the State as evidenced by the reduction in gasoline sales. **E.1.2 E.3.2 E.5**

Local drivers in residential neighborhoods have faced congestion and have had their driving patterns changed to accommodate through traffic to the downtown. Many neighborhoods have recently imposed their own mitigation to limit parking impacts. But preferential parking has some negative impacts. These impacts constitute a reduction in the quality of life in our City. We consider that these impacts are unfair and unnecessary. Most of the impacts could have been easily avoided if adequate mitigations were implemented in a timely manner. Unfortunately the subject EIR does not even consider the increase in congestion, past and future, on streets outside of the downtown as an impact. This is a major fault of the EIR. The increase in congestion on city streets will cause further delays and crush-loading in Muni service, worse than prdicted in the EIR. **E.2.2.3 E.3.2 E.4 E.6.4**

With all of the impacts properly assessed we can proceed to consider mitigations. The EIR lists 52 transportation mitigations. These mitigations if properly implemented would tend to alleviate the impacts. However the EIR presents no certainlty that the mitigations will be implemented. History indicates that transportation improvements lag the need until we learn to accept a lower quality of transit and that the improvements never quite return us to our previous standards. **E.6**

There are three major requirements which must be im place before mitigation can be implemented. The EIR is only a wish list of mitigations and can not insure that they will be implemented. **E.2.1.2 E.6**

The first requirement is money. Only partial funding is available for the initial required increases in transit capacity. The necessary future major improvements are identified but there is no firm funding commitment. Time is always a major requirement for transportation facility additions. Lead time for equipment must often be added to design, public review and financing requirements. **E.2.1.2 E.2.7 E.6**

Probably the greatest problem of all is political, i.e., the people and their government must change:

* We must reduce our desire to drive our private automobiles into Downtown.

* We must increase our willingness to accept the tumult of construction adjacent to our businesses and homes.

* We must be willing to pay for increases in transit capacity.

* We must implement a Transit First Policy.

Only if we change in these ways can we maintain reasonable transit standards while the downtown grows. What most of us want is the perceived advantages of downtown growth without paying the price of the changes required. The EIR is completely correct when it points out that these changes must take place. the problem is that everyone hopes that someone else will accept the changes not them. **E.3 E.6 E.6.2.4 E.6.3 Z.1**

Because of all of the difficulties involved in implementing a mitigation we can not be sure that they will be implemented. The EIR agrees that many of the mitigations are essential. Page V.E.1 of the EIR states that "if the plan, or proposals similar in nature or intent, are not followed, the growth rate may need to be slowed as a matter of deliberate public policy."

We must insist that the necessary mitigations be scheduled item by item, in the EIR, along with a maximum permited annual development. In fact, since previous impacts have already reduced the quality of transit service some mitigations are necessary before any additional development should be allowed. Therefore, the ordinance which creates the downtown plan should include:

1) A low annual rate of development until some of the HOV and contraflow transit lanes discussed in mitigation items 15 and 19 are implimented. This will indicate that we are serious about the solution to transportation problems and to encourage people to comply with the content of the plan and improve service for some transit users, all at very little expense. The first stage should also include the completion of funding and the completion of a significant portion of the Muni and BART 5 year plans.

2) The second stage should include a finite amount of development in parallel with completion of the 5 year plans and additional finite amounts of development should only be permitted after each step of necessary transit project and system change is undertaken. If the ordinance includes a requirement for the completion of the mitigation, the developer will provide the necessary pressure to implement the mitigation. Care should be taken to insure that none of the steps are also being counted as required for service in other counties.

E.6
P.2.1

Since we believe that the motivation of the public to build and use the transportation systems necessary to insure the sucess of your Downtown Plan while preserving the livability of our City, is the biggest problem, we are compelled to offer you the 53rd mitigation. We suggest that the EIR include a suggestion that the parking tax be increased. The tax should be on each parking place and should be increased annually until tax revenues reach a maximum, i.e., the percentage decrease in the number of parking places is greater than the percentage increase in the tax. The annual increase could be $100-200 per parking place per year or only $.50 - 1.00 per working day. **E.6.4**

Ultimately the City would be collecting additional revenues from 50,000 parking places, times $2500 per place per year or $125,000,000 per year. This could be used to fund most of the City's transit improvements. More importently it would tend to induce more people to car pool or ride public transit and help them to convince their county governments to meet their transit obligations. Your Downtown Plan requires a revolution in peoples commuting habits for fulfillment. The 53rd mitigation provides the incentive to start the revolution. **E.6.4**

If you can see that there is a probability that the people and/or their governments are not willing to take all of the steps to make the Downtown Plan work then the EIR should have included another alternative. Development could be severely restricted in San Francisco and and encouraged in the East Bay communities. Modern electronics, and the BART would make communication between the seperate downtowns quite efficinet. Transportation times for the new downtown workers who will want to live in the East Bay will be 10-15 minutes shorter. San Francisco would have time to correct the present shortages of transit and housing, and the esthetic and cultural objectives of the plan would be met without the pressure of excessive growth.

D.3.2.4
E.6.1
Q.1
Q.2

Conventional wisdom holds that new development will provide jpbs for unemployed San Franciscans. This is not so. Unemployment in San Francisco is less than the rest of the State and Nation. Our unemployed are not prepared to perform the office jobs which will be offered. The only current San Francisco residents who will get jobs in the new developments are construction workers. These jobs will only be temporary. The work will be done by new people to the area who will try to squeeze in to San Francisco housing and transit or choose to live in the surrounding counties with similar problems. We must be very careful not to destroy the quality of life in San Francisco to benefit people who haven't yet moved here. My normal tendencies would be not to help you make a success of the ~~projects~~ downtown plan. But, I have learned over the years that the development will proceed, so let us do it right.

A.1
B.5
B.5.1
B.5.3
Z.1

Thank you.

rides
FOR BAY AREA COMMUTERS, INC.

RECEIVED
MAY 3 - 1984
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

May 3, 1984

Mr. Alec S. Bash
Department of City Planning
450 McAllister Street
San Francisco, CA 94102

Dear Mr. Bash:

RIDES for Bay Area Commuters is the organization with the primary responsibility for implementing carpooling and vanpooling programs for San Francisco and the Bay Area. Consequently, we have reviewed the Downtown Plan Environmental Impact Report. Our review concentrated primarily on section V.E. Transportation and Circulation Mitigation Measures. Our comments are preceded by the page number and subheading. General comments follow the specific comments. Z.1

V.E.12 14. Provide high occupancy vehicle lanes on freeways and freeway on-ramps.

Although this mitigation measure is cited as a primary incentive that will encourage individuals to rideshare as congestion worsens, its recommendations are vague. Studies should be initiated to identify corridors where HOV lanes would prove effective. Since HOV lanes are major projects, they will require strong support by the City in order to be implemented. E.6.3.2

V.E.21 31. Provide preferential parking spaces and rates for carpools and vanpools.

Any parking structure that provides preferential parking for vanpools must have a minimum clearance of 6'9" on at least the entrance level. The zoning and building codes should reflect this requirement. E.6.4.1

V.E.23 35. Require transportation brokers to be employed by each major new development or by groups of smaller projects in the downtown.

The proposed system of transportation brokers is an excellent approach for educating individuals and making commute alternatives available to C-3 District Employees in new developments. If the system is effective with new developments, perhaps a study should be done to investigate the feasibility of a similar system in existing developments. E.6

V.E.28 47. Prepare and adopt policies that would permit or require private developers to make cash payments in lieu of providing on-site parking. E.6.4

601 Van Ness Ave., Suite 2006, San Francisco, CA 94102-6385 (415) 861-POOL

Channeling developers' money to peripheral parking would adversly impact regional highways and bridges by providing incentives (i.e. parking) for individuals to drive. A more appropriate use for the resources that the developers save by decreasing parking might be into a planned commute alternatives program. Developers could plan and implement extensive commute alternative programs in lieu of providing on-site parking. This trade-off is currently being used in the City of Los Angeles. **E.6**

General Comments:

1. The Downtown Plan assumes that increased driving costs and increased levels of congestion will automatically increase the percentage of transit and rideshare users by approximately 13% each. The plan also calls for vast improvements in the transit system to reach these goals. But the plan makes little mention of improvements to the programs (such as RIDES) and the systems that support ridesharing. We feel it may be unrealistic to assume such a major change (i.e. approximately 70,000 people carpooling and vanpooling daily by 2000) without increased program support and direct actions by the City to provide infrastructure improvements that aid ridesharing (such as preferential parking for vanpool vehicles in City garages, high occupancy vehicle treatments on city streets and the like). **E.6.3.2**

2. The Downtown Plan calls for the preparation of an "annual growth monitoring report" which would assess the effectiveness of the transportation policies. We monitor several variables that might be useful to include in this report (e.g. the number of vanpools we are assisting that commute to San Francisco, the number of applicants in our data base with a destination of San Francisco, the percent of San Francisco applicants that are placed into carpools and vanpools, etc.). **P.2.3**

Thank you for the opportunity to review the Downtown E.I.R.

Sincerely,

Steve J. Beroldo
Planner

SJB:ka

AC Transit
Alameda-Contra Costa Transit District

508 16th Street, Oakland, California 94612 ☐ (415) 891-4856

L. A. KIMBALL
GENERAL MANAGER

May 3, 1984

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MAY 4 - 1984
CITY & COUNTY OF S.F
DEPT. OF CITY PLANNING

City Planning Commission of
San Francisco
450 McAllister Street
San Francisco, CA 94102

Dear Members of the Commission:

The Alameda-Contra Costa Transit District has reviewed the currently circulating San Francisco Downtown Plan (and Draft Environmental Impact Report), and commends the City and its Planning Department staff for undertaking this difficult but necessary task of reviewing policies for downtown development. The District is especially supportive of the Plan's attempts to discuss solutions for what many regard as the critical issue of continuing CBD growth: the resulting transportation and circulation impacts. **Z.1**

Improving the level of public transit service to the downtown will be an instrumental factor in maintaining San Francisco as a viable, attractive center of financial and commercial activity. Physical transportation improvements, such as transit lanes, subways and HOV lanes, and transit operational improvements, such as preferential treatment of bus rather than auto traffic and bus shuttle services from transit terminals to local points of interest, would considerably assist transit providers in serving the downtown. These suggestions of the Plan should be implemented. **Z.1**

In addition to a general expression of support for the Downtown Plan, AC Transit would also like to address two important questions raised directly or indirectly by the Plan as they pertain to our operations. It may be helpful to (1) clarify the District's position on providing service to San Francisco, and (2) point out to the Commission that other innovative policies adopted by the City in the Downtown Plan could greatly assist us in further accommodating downtown development. Our specific comments follow. **Z.1**

Transit Capacity. For the many additional workers who will be commuting to downtown San Francisco from the East Bay in the next ten to twenty years, only the BART system, the Plan indicates, has developed an expansion program to handle the anticipated transit demand; AC Transit has no comparable program and may by the year 2000 be unable to provide bus service to almost 3000 persons who would normally ride transbay buses. **E.2.4**

In part, the assumption about AC Transit's capacity plans is accurate; the current Short Range Transit Plan does not identify fleet expansion for transbay service. This could well change, however, in future plans. Presently, there is adequate capacity on most of the District's transbay lines; we have, in fact, observed a leveling off of ridership. In coming years, the growth in bus commuting to San Francisco is expected to resume and the District's response will be formulated as a result of (1) a long-range planning process, recently undertaken, which will help identify existing and unmet transit needs in our service area and various means of reallocating District resources to better serve these needs, and (2) continuing studies of high capacity buses that can be substituted for standard coaches on heavily used bus lines. Both efforts are indications of the District's continuing attempts to respond positively to transportation problems, not overlook them. **Z.1**

Funding Transit Service. Although the District has the flexibility to increase existing capacity, certainly in the short term by changing our fleet mix through new vehicle purchases, we may not have (in the later years covered by the Plan) sufficient resources to operate the higher level of transbay service required by continuing downtown employment growth. Because AC Transit receives no additional public transit subsidies in the form of local sales or property taxes from economic activity outside District boundaries, we have only fare revenue or other local resources to draw on for expanding transbay service. Fare revenue would probably be far from adequate to offset added operating costs. Surely it would be unfair to our many local and express riders if the District's limited operating resources had to be redirected to facilitate the commute of San Francisco workers living in the East Bay. The direct and indirect costs that will be faced by AC Transit as a result of implementing the Downtown Plan ought to be acknowledged immediately, and a more practicable way found for funding expanded transbay operations. **E.2.4**

The City of San Francisco should recognize that downtown development places substantial burdens on transit operators apart from MUNI, and in its ongoing deliberations to secure increased funding for the Municipal Railway, also provide for the needs of a public transit provider like AC Transit. Transportation impact or related fees on downtown development could be allocated to AC transbay as well as to local operations. The best interests of San Francisco and the region would be served when those who benefit from downtown development (but are also responsible for creating serious transportation congestion) are required to participate directly in funding the appropriate mitigation measures. **E.2.7.2**

These are the main points AC Transit wishes to bring to the attention of the Commission and other City officials studying the many implications of the Downtown Plan. We hope they are received favorably, and the City of San Francisco will proceed and assist the District in our efforts to offer transit support for a dynamic urban economy. **Z.1**

Sincerely,

L.A. Kimball
General Manager

785 Carolina St.
San Francisco, CA 94107
May 1,1984

SM

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MAY 4 - 1984
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

Dept. of City Planning
Downtown Plan EIR Comment
450 McAllister St.
San Francisco, CA 94102

Dear Sir;

This is a comment in writing to the Dept. of City Planning on
the Downtown Plan and it's EIR which I understand must be taken **S.1.1**
into account in the EIR.

Since the 1960s I have watched the City mushroom from my home
on Potrero Hill. I also have a clear view of the freeways, 101
and 280, from my home and have watched the morning and evening **E.3.1**
commute traffic jams get longer and longer. **Z.1**

Much of the development engendered by the Downtown Plan would
take place south of Market Street. With the TDRs it could be very
substantial development. The Mission Bay Project is another
massive development proposed for south of Market Street with **B.1.1**
very high density and millions of square feet of office space. **B.2.1**
I don't see how the Downtown Plan EIR can have any validity or **B.2.3**
meaning without including the effects of the Mission Bay Project **E.1.1.1**
on traffic, density, quality of life, views, etc. in the Downtown **E.1.5**
Plan. **E.1.9**
D.2.5

The stadium is yet another serious South of Market Street proposal
that would have enormous impact on the City in terms of traffic,
congestion, and views and cannot be ignored. Showplace Square **B.2.2**
across from the proposed stadium site already has big parking **B.2.3**
problems. **N.2**

Please include the potential effects of these major South of
Market Street projects in the Downtown Plan EIR. **B.2.1**
B.2.2
B.2.3
E.1.9
N.2

Sincerely,

Margo C. Bors

Margo C.Bors

STATE OF CALIFORNIA—OFFICE OF THE GOVERNOR
GEORGE DEUKMEJIAN, *Governor*

OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO, CA 95814

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MAY 4 1984
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

May 3, 1984

Ms. Sally E. Maxwell
San Francisco, Department of City Planning
450 McAllister, 5th Floor
San Francisco, CA 94102

Subject: SCH #84032003, EE81.3: Downtown Plan EIR.

Dear Ms. Maxwell:

The State Clearinghouse submitted the above named draft Environmental Impact Report (EIR) to selected state agencies for review. The review period is closed and the comments of the individual agency(ies) is(are) attached. If you would like to discuss their concerns and recommendations, please contact the staff from the appropriate agency(ies).

When preparing the final EIR, you must include all comments and responses (CEQA Guidelines, Section 15132). The certified EIR must be considered in the decision-making process for the project. In addition, we urge you to respond directly to the commenting agency(ies) by writing to them, including the State Clearinghouse number on all correspondence.

In the event that the project is approved without adequate mitigation of significant effects, the lead agency must make written findings for each significant effect and it must support its actions with a written statement of overriding considerations for each unmitigated significant effect (CEQA Guidelines Section 15091 and 15093).

If the project requires discretionary approval from any state agency, the Notice of Determination must be filed with the Secretary for Resources, as well as with the County Clerk. Please contact Price Walker at (916) 445-0613 if you have any questions about the environmental review process.

Sincerely,

John Ohanian

John B. Ohanian
Chief Deputy Director

cc: Resources Agency
attachment

of California **Department of Health Services**

morandum

Terry Roberts
STATE CLEARINGHOUSE
1400 Tenth Street, Room 121

Date : April 25, 1984

Subject: Downtown Plan EIR
SCH #84032003

ENVIRONMENTAL HEALTH DIVISION
714 P Street, Room 430
322-2308

5/03

The Department has reviewed the subject environmental document and offers the following comments.

The sections on noise misconstrue the use and meaning of L_{dn} and land use compatibility (Figure IV. J. 1, page IV. J. 2). The compatibility chart is to be used as a guideline and tool for land use decisions, it is not a criterion for acceptability or human satisfaction with the noise environment. For example, recent research indicates that people are more annoyed by aircraft noise than by traffic noise of equivalent L_{dn} values. About 10 percent of people exposed to traffic noise of $L_{dn} = 60$ in residential areas report being highly annoyed with the noise, and each increase of 1 L_{dn} is associated with an additional 2 percent being highly annoyed. About twice these numbers are highly annoyed when aircraft are the noise sources. More importantly, when traffic noise exceeds 60 L_{dn} people begin complaining and group and legal actions to stop the noise should be expected when traffic noise exceeds 70 L_{dn}. Of course, some people change their modes of living to accommodate the noise, as was illustrated by Appleyard in his study of San Francisco neighborhoods. (D. Appleyard. Livable Streets, Berkeley: U.C. Press, 1981.) J

The text makes reference to California's Noise Insulation Standard requiring noise level reductions to $L_{dn} = 45$, and by implication the noise problem is mitigated if the standard is attained (see bottom paragraph, page IV. J. 17). It is worthwhile to estimate what this means. On page IV. J. 11, Pine Street in Subarea 7 is of continuing concern because noise levels are at and will continue to be $L_{dn} = 75$ (Table IV. J. 2). In order for indoor noise levels to attain $L_{dn} = 45$, 30 dB of noise reduction is required. Thus, bus noise at 95 dBA (page IV. J. 11) will attain levels of 65 dBA indoors (a 30 dB reduction). These events are expected to occur every three minutes during rush hours. If these events occur in the morning or nighttime hours, significant disruption of sleep is to be expected, particularly if other traffic is infrequent (note, the discussion about the intrusiveness of noise at the top of page IV. J. 11). During the daytime, men would be required to use "raised" voice levels (as opposed to "normal" levels) to be barely understood if they are separated by a distance of 6 feet. At distances greater than 6 feet J

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APR 30 1984
State Clearinghouse

increased vocal effort would be required. Women and children, who typically speak more quietly than men, would be required to use "raised" voice levels to communicate at distances of 4 feet. In schools, which are not mentioned in the EIR, typical distances between teachers and students are greater than 4 to 6 feet. If the distance is 12 feet, men would be required to shout in order to be barely understood when the buses pass. Women and children are unlikely to hear or understand what is being said during these events. J

In light of the preceding descriptions of annoyance with varying L_{dn} levels, the statement on page VII. J. 4, that "Differences in environmental noise levels of less than 3 dBA are not detectable to the human ear" is in error. The statement is correct, however, if the referrent is the noise generated by two buses passing by at different times. J

Project developments include numerous commercial enterprises. Of these, retail uses and hotels may generate significant increases in heavy truck traffic. Bus traffic is also projected to increase. Existing and projected ADTs (average daily traffic), number of buses and trucks, hours of operation, etc. are not provided in Section E (page IV. E. 7, f), yet such data are required by the Highway Traffic Noise Prediction Model (see "Source" in Table IV. J. 2, page IV. J. 10). What values were used to estimate the L_{dn}s shown in Table IV. J. 2? J

To what extent has the City attained the Transportation Noise Control Objectives listed in Table IV. J. 1,(page IV. J. 3)? The mitigation measures proposed (Section J., page V. J. 1) in general appear to repeat those Objectives, with the exception that Objective 1, Policy 1 dealing with enforcement of "noise emission standards for vehicles" has been deleted. It appears that diesel buses may be among the violators of those standards. If so, they are inconsistent with Objective 1, Policy 3, which "Limit(s) City purchase of vehicles to models with the lowest noise emissions ...." J

Mitigation measure Number 1 (page V. J. 2) suggests that maintaining the "smoothest possible street surfaces ... would noticeably reduce traffic noise levels ...." What is the expected noise level reduction? J

If you have any questions or need further information concerning these comments, please contact Dr. Jerome Lukas of the Noise Control Program, Office of Local Environmental Health Programs, at 2151 Berkeley Way, Room No. 613, Berkeley, CA 94704, 415/540-2665. J

Harvey F. Collins, Ph.D., Chief
ENVIRONMENTAL HEALTH DIVISION

Submitted 3/4/81

Donald Lee Nieto
55 Bronte St.
S.F. Ca. 94110

To Planning Commission
Via Mr. Robert Passmore;

Dear Sirs; In your posession is a 3/4 of a million dollar study. A document unpartisan and non political. 1500 hundred pages, I hear. And 4 or more inches thick. No, I have not read it. It is doubtfull if any man has done so completely. It's mind boggleing. But I understand that it also presents questions as well as ramifications regarding what is commonly known as "Manhattenization". Idealogicly, as planning commissioners it is your commission to safeguard the public. I won't speak of human failings by addressing non ideal acts. But to demand that this "separate of politics" statement be considered for what it is; an omen. **Z.1**

Our democracy presented an issue on a recent ballot regarding the proliferation of office towers. Yea or Nea. Yea nearly won. From the few who voted. The last election drew a maximum of 144,000 votes on an issue and it wasn't for whom shall reign as mayor elect. 144,000 out of 600,000 eligibles. Not a very good democratic turnout. I use to in the non election margin. Did not something turn me around? I wonder what. Of that, you all have some insight. As in voices round about. Too Much! So sensitive. It's no wonder to me why I'm currently subdued. But my vote is nay on manhattenization and gentrification. Both products of planning decisions. I like to think I'm speaking for the "no faith" voters who don't vote. **Z.1**

Your E.I.R. hearing by law has brought out a majority by a long shot opposition to acceptance of that eir simply because it is (printed). I'd like it examined in the sense presented by Commissoner Bierman before the closeing of that last meeting. And if the problems presented by the eir itself can not be satisfied in a way pertinant to human rights, then we arrive at a no growth situation and must address then the economics of such a decree. Face up to it! In this case, Feinstein's perpensity. And also Moscone's.

The least among us; workers, non intellectuals, the perplexed, rely on what has not been. People who care. Idealy, as commissioners you are obligated to no polictician. Realisticly, I know such is not the case. But the system is purported and exhibited in the idealistic sense. As per Feinstein's recent address to you all. You can deny her. **S.1.1** **Z.1**

②

What marveloms power! What a statement to use the 3/4 of a million dollar study against her. She asked that you rush through permits and when her written rhetoric was compleat, she could not even look up at that gathering. She left looking at bugs on the floor of that much frequented room. Her statement is only an opinion that was not spoken generally during her campaign. You do not have to go along with what her perpensity dictates to herself. Z.1

Unlike an approval of an office tower of "no significant inpact" that is somewhat true to the word, this eir purports otherwise. Regarding what it addresses. A lot it does not address. Those points were well made by professionals during said hearing. Summerized verly eloquently by the angel who addressed you after I shouted myself to death. In all sincerity, I a peal that if any; you reread the transcript of his utterances. That former cable car operator and cabbie. For "Ego or bribes do blind". That I think of you guys. Z.1

Consider that the pyramid building is the ultimate statement. And Jesus's shroud the other. So, we are between the rock and the hard place. A biblical saying. That building represents the other side. Christians vrs fanatics. Stiff necks vrs reason. Just how long will HE hold up? Both Jews and Christians of Nazi Germany got it so that tells me something. And of course the nazi's got it. Rings of Nebuchadnazzar and captivity of the past. In the end, Neb got it. For the word became perverted. I address those facts "Under God" our protector that we relinquished. As proven by magic's eye. Z.1

You all are in prime position to draw from that eir lest we fall into further error. I've been punished into writeing all this. I'm not crazy. Nor a prophet. But some day, a prophecy. I've been shaken into belief. And this is his warning that you all lighten up. The mayor refuses to listen. I refuse to act as per angelic sayings. As per violence. Z.1

Harvey Milk described Feinstein as that "wicked witch of the west". From all that I've seen of her rhetoric, I totally agree. Moscone, the same. As the lord decreed. Now, I wasn't particualarly religious in days past but there was something natural about me that made me what I am; for the most part--honest. Climb Mt. St. Helens for a charge. But being honest is the ultimate charge. Beats any peak. And most scarray. Minus the a. Z.1

One more page. Grant the indulgence. Ignore the typos. "Melt city hall" with passion. Scale the peak. So we can well speak. Exercise authority. In the name of sanity. You must all have enough money for life if you get fired. If nothing else, collaborate on a book regarding your turnaround. For you all do have significant impact of people's lives and that I levy against you all. So help me GOD. Good and compassionate. And terrible. The judge of all. Even if God is only a spirit which is impossible to believe. In that, I deny the new testament. For it is written, "God is a spirit." Agreeded I am short on understanding. But literally, that statement is not true. I appeal to you only as a spiritual man, God made. And a repenter from acts performed on me. **Z.1**

I can not write or address you all on a secular basis. Regardless of what is said, the power is in your hands to do what you want. I must appeal to your hidden spirituality. In that, the church does. We are not silly. Our eyes are open to magician's reality of their useing spirits above. What can be considered as the third party. Now you know. If you knew, then I know where you or you all are coming from. In that statement prior, I may have erred. But now city hall knows I prayed. And am at wit's end. **Z.1**

A scientist once addressed Supervisor Nancy Walker regarding the nuclear threat and use of nuclear reactor discoveries. He said, "we only discover. You are the management." Oh, of such hands of politicians who taketh the bribe and swap favors to be in such a decission makeing position. Expect nothing. Rebell and be no longer a politician. The elected of similar minds. **Z.1**

Now, finally, the existance of God also says the existance of satan. An equal with God in power. Which indeed tends to make God as a spirit. With that in mind consider what we do and perhaps we can admit to being sinners which is why satan has not be destroyed. That will be the job of Leviathan, the prophecy of Job 41, Isaiah 27 (he will slay the dragon) psalm 104-26, 74-14. **Z.1**

In your minds, you must know you all do wrong. This day you challenge me when you do. Well, one way to slay satan is to reveal it. Have I not revealed the slanderer? Is not the gist of all this, understandable? Does not you doubt make you all like so much excrement? And who causes doubt? Is it not the slanderer? So, hear my prayer. **Z.1**

BART

BAY AREA RAPID TRANSIT DISTRICT
800 Madison Street
P.O. Box 12688
Oakland, CA 94604-2688
Telephone (415) 465-4100

RECEIVED
MAY 9 - 1984
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

April 30, 1984

ARTHUR J. SHARTSIS
PRESIDENT
NELLO BIANCO
VICE-PRESIDENT
KEITH BERNARD
GENERAL MANAGER

DIRECTORS

BARCLAY SIMPSON
1ST DISTRICT
NELLO BIANCO
2ND DISTRICT
ARTHUR J. SHARTSIS
3RD DISTRICT
MARGARET K. PRYOR
4TH DISTRICT
ROBERT S. ALLEN
5TH DISTRICT
JOHN GLENN
6TH DISTRICT
WILFRED T. USSERY
7TH DISTRICT
EUGENE GARFINKLE
8TH DISTRICT
JOHN H. KIRKWOOD
9TH DISTRICT

Mr. Alec S. Bash
Environmental Review Officer
Department of City Planning
450 McAllister
San Francisco, CA 94102

Dear Mr. Bash:

Re: The Downtown Plan, Draft EIR

Thank you for the opportunity to review and comment on the above-referenced document. BART staff has several comments. **Z.1**

At this time BART revised its 1.3 load factor objective and now uses a 1.5 load factor during the peak hour as a planning "rule of thumb." **E.2.3**

In the text on page V.E.4 it is noted that the "BART expansion program will not start until after 1986 because of the on-going fire hardening program." This is not accurate. The BART expansion program consists of seven key projects, all of which are currently being implemented. These projects include:

1. Acquisition and delivery of 150 new C-cars.
2. New on-board automatic train control (ATC).
3. KE track - a third track through Downtown Oakland.
4. Vehicle fire hardening program.
5. Integrated control system.
6. Daly City turnback/storage facility.
7. Primary train detection system. **E.2.3**

New train service will be phased in over a five year period beginning in the Fall, 1984 with the addition of two peak period transbay trains. The fire hardening program is not an obstacle as implied in the text, but is one of several key elements in the overall program. **E.2.3**

Also, in Table VII.E.1 both 1984 and 1990 patronage should be corrected as indicated on the attached copy of that same table. **E.2.3**

And finally, enclosed for your information is the BART extension staging implementation program. **Z.1**

If you have any questions, please call Bruce Bauer at extension 464-6173.

Sincerely,

Barbara A. Neustadter
Manager of Planning

cc: B. Bauer
G. Gleichman
M. Birkenthal

TABLE VII.E.1: COMPARISON OF P.M. PEAK-HOUR TRANSPORTATION IMPACTS, 1984, 1990, 2000 UNDER THE DOWNTOWN PLAN, AND 2000 UNDER ALTERNATIVES 1 THROUGH 5

			2000					
			Downtown	Alternative				
	1984	1990	Plan	1	2	3	4	5
Person Trip-ends(a)								
Work	125,200	144,100	166,600	172,800	171,400	169,600	164,300	164,900
Other	49,200	55,100	61,300	63,900	63,400	62,600	61,000	61,000
Total	174,300	199,200	227,800	236,800	234,800	232,200	225,300	225,900
Vehicle Trip-ends(a)								
Work	31,400	33,800	36,100	37,300	37,100	36,800	35,300	35,600
Other	3,600	3,600	3,500	3,700	3,600	3,600	3,400	3,400
Total	35,000	37,400	39,500	41,000	40,700	40,300	38,800	39,100
Transit Ridership(b)								
Muni								
Northeast	7,100	7,900	8,800	9,000	8,900	8,800	8,900	8,900
Northwest	8,200	9,200	10,100	10,300	10,200	10,100	10,200	10,200
Southwest	13,500	15,100	16,600	16,600	16,500	16,400	16,300	16,300
Southeast	5,300	6,200	7,400	7,300	7,300	7,300	6,900	7,000
BART	17,[illegible]	23,[illegible]						
Transbay	16,100	20,500	27,900	29,400	29,200	28,800	27,400	27,400
SW of Civic Center	7,700 [illegible]	8,300 9,[illegible]	10,100	10,500	10,400	10,300	10,000	10,000
AC Transit	9,100	10,500	10,300	10,700	10,600	10,400	10,000	10,100
Golden Gate Bus	5,300	6,600	8,500	9,000	8,900	8,800	8,000	8,400
Golden Gate Ferry	800	1,100	1,500	1,500	1,500	1,400	1,300	1,400
Tiburon Ferry	200	200	300	300	300	300	300	300
SamTrans	1,900	2,400	3,100	3,200	3,200	3,100	2,900	3,000
CalTrain (SPRR)	3,100	4,000	4,900	5,100	5,000	4,900	4,800	4,800
Regional Traffic Volumes(b)								
Bay Bridge (I-80)	8,540	9,180	9,790	10,030	10,030	10,050	9,600	9,650
Golden Gate Bridge (US-101)	6,740	7,020	7,150	7,370	7,330	7,280	7,130	7,110
US-101 (South of Harney Way)	7,390	7,890	8,400	8,580	8,550	8,520	8,330	8,330
I-280 (Between Alemany Blvd. & San Jose Ave)	7,610	8,120	8,650	8,830	8,800	8,770	8,580	8,580

(a) C-3 District travel only.

(b) Includes travel from the C-3 District, from outside the C-3 District, and outside San Francisco.

SOURCE: TJKM Transportation Consultants

BART EXTENSION STAGING

(The several segments shown under each Roman numeral are understood to be implemented concurrently.)

INCLUDED WITHIN CURRENT THREE-COUNTY DISTRICT PRIORITY

I. North Concord/West Pittsburg

Irvington/Warm Springs

Castro Valley/Dublin

San Francisco Airport

II. Pittsburg/West Antioch/East Antioch

Pleasanton/West Livermore/East Livermore

San Francisco*

I-80 Corridor (Partial)

III. San Francisco*

I-80 Corridor (Partial)

San Ramon Corridor

STATIONS OUTSIDE CURRENT DISTRICT (Subject to a satisfactory cost-sharing arrangement)

I. Serramonte/Tanforan

II. Millbrae

Milpitas/San Jose

III. Burlingame/Menlo Park/Palo Alto/San Jose

---

*San Francisco has a BART commitment for a northwest corridor extension or an equivalent project.

Board adopted September 1, 1983
Board amended February 2, 1984

BEFORE THE BOARD OF DIRECTORS OF THE

SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT

In the matter of
improved access to
the Oakland Airport/

Resolution No. 3095

BE IT RESOLVED, that the Board of Directors of the San Francisco Bay Area Rapid Transit District supports the establishment of a people-mover, or some other mode of travel, to the Oakland Airport before or at the same time that an extension of BART is built to the San Francisco Airport.

# # #

Adopted February 2, 1984

Chinatown Neighborhood
Improvement Resource
Center
華埠改進協助社

May 2, 1984

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[illegible] 10 [illegible]
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

Commissioner Toby Rosenblatt
Planning Commission
450 McAllister Street
San Francisco, CA 94102

RE: DOWNTOWN PLAN EIR

Dear Commissioner Rosenblatt:

On behalf of the Chinatown Neighborhood Improvement Resource Center, I would like to express some concerns about the Downtown Plan and its potential impacts on the Chinatown community. Our analysis of the Environmental Impact Report reveals some disturbing consequences and leaves many important questions unanswered. Z.1

The Plan permits downtown growth to continue at an unrelenting B.1
pace - a pace which will cause hardships for all of San B.2.1
Francisco's neighborhoods. These impacts will harm Chinatown to B.2.2
a disproportionate extent. Increased demands for housing, B.4
parking, open space, and transit will be crippling in our
neighborhood, where the shortage of these necessities of urban D.3.1
life is well known. It is important to remember that downtown E.2.2.3
does not sit in a vacuum and that not all negative impacts of E.3.2
growth will be within the financial district itself. E.4.2
N.2

According to the Environmental Impact Report, the Downtown Plan will allow growth sufficient to attract an additional 30,300 new downtown office workers by the year 2000. An increase of 1,000 to 1,500 new housing units will be necessary annually to house these newcomers. The EIR states, however, that "housing growth in San Francisco will not increase in proportion to C3 district job growth." Those of us in the business of providing housing know how difficult producing new units is, and the implementation schemes proposed in the Plan leave many questions unanswered. Where are these people going to live? It is likely that many of these employed newcomers are going to be seeking housing in the extended Chinatown area - North Beach, Telegraph Hill, Russian
Hill, etc. - competing against current residents, particularly B.4.2
families moving out of Chinatown. D.3.1

615 Grant Avenue, Second Floor, San Francisco, California 94108-2498 415 / 391-4133

While the growth permitted under the Downtown Plan will certainly
increase the demand for housing, the mechanics of increasing
supply are vague. Affordability, unit size, location, and D.4
ownership are unaddressed. D.5

The Environmental Impact Report says that the Plan "could
accelerate the spillover of office activities into Chinatown and
North Beach". Obviously we are not dealing with new construction
on vacant land: new office growth within Chinatown and North
Beach must inevitably displace existing small businesses and
housing. Additionally, we must remember that Chinatown housing
needs dictate public policy priority for affordable housing A.3
construction on sites near the Chinatown core area. Two examples B.4
of sites which have already been lost to this process are the D.4
Savoy Garage site and the Pacific/Montgomery site. Both of these D.5
sites were identified as housing opportunity sites in the 1972 N.2
Chinatown 701 study. Both are now office buildings. Z.1

We are particularly concerned about the potential for the
Downtown Plan to encourage new office building construction on
the fringes of Chinatown contiguous to the financial district.
For example, the stretch of Kearny Street between Sacramento and
Washington Streets is quite vulnerable. The area surrounding
these blocks will be limited to height limits between 75 and 250
feet while the Chinatown height limit will remain at 300 - 320
feet. Clearly, this disparity could serve to encourage developer
interest in Chinatown. For this reason, we support the B.4.1
establishment of interim controls on Chinatown pending the A.3
rezoning currently being studied by the Department and community. Y.2

The transit needs of Chinatown residents are currently
underserved and the Environmental Impact Report is quite graphic
about the requirement for new transit facilities to bring new
office workers in and out of downtown. The mechanisms to finance
and implement these improvements -estimated to cost billions of
dollars - is unstated. What impact will this tremendous growth in
transit demand have on the lines which barely serve Chinatown
needs? Will it be possible for Chinatown residents to board a 30
Stockton, 1 California, or 15 Kearny during rush hour? Will it be E.2.1
possible to walk on the streets of Chinatown? The EIR, assuming E.2.2.
optimistic transit growth and that 3,000 City residents will give E.4.1
up driving to work, projects a 6,000 space parking deficit. Where E.5
will those cars park? E.6

Portsmouth Square is an oasis in Chinatown. Thousands of people enjoy that bit of open space daily. What will that square be like with 250-foot tall buildings - or higher if tapered - one block to the South? Questions such as these concerning open space, housing, transit, and parking are not sufficiently addressed in

A.3
D.3.1
E.2.2
E.4.2
H.3.1

the Downtown Plan Environmental Impact report.

The Planning Department is now embarking on a new plan for Chinatown. But will such a plan be meaningful if our neighborhood is shadowed, gridlocked, and displaced by Downtown? It is vitally important that Chinatown be considered during the Downtown planning process and that interim controls be instituted to protect Chinatown while planning occurs.

A.3
E.3.2
N.2
Y.2

Sincerely,

Gordon Chin
Executive Director

cc: Mayor Dianne Feinstein
Planning Commissioners
Dean Macris ✓

City and County of San Francisco **Department of Public Works**

Office of the Director

May 11, 1984

Downtown Plan DEIR
File #39

RECEIVED
MAY 14 1984
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

Mr. Alec Bash
Environmental Review Officer
Department of City Planning
450 McAllister Street
San Francisco, CA 94102

Dear Mr. Bash:

We have reviewed the subject documents and offer the following comments regarding the transportation sections:

1. The transportation analysis projects that there will be some differences in peak-hour travel to and from the C-3 district in the peak hour (Table VII.E.1) by the year 2000. It is difficult, however, to discern from the analysis how much impact the Downtown Plan or the Alternatives themselves would have at the regional or downtown screen lines. Page IV.E.31 of the text states that "non C-3 components of vehicular travel at regional screenlines have been projected on the basis of historical trends", whereas Table IV.E.3 (pg. IV.E.35), footnote (b) states that "if the Plan Goals are achieved, the traffic volumes for the years 1990 and 2000 would be similar to those shown for 1984." The latter indicates that non C-3 traffic growth at the regional screenlines would not occur, and perhaps this footnote is in error. In any case, a chart or table summarizing the breakdown of projected C-3 and non C-3 person trips and vehicle trips at the regional and downtown screenlines would be helpful in putting the magnitude of the C-3 portion of the transportation impacts of the various alternatives into better perspective. **E.1.8**

2. It would also be helpful to the understanding of the differences between the Downtown Plan and the various alternatives to list together in a summary those impacts that will occur under all of the alternatives to more or less the same degree and to list separately those impacts that vary to a considerable degree. Such a summary might help to focus attention on what impacts a decision may eventually affect. **E.1.8**

3. The transportation impact assessment states in part that "peak hour conditions would be expected to deteriorate at all ... intersections by the year 2000. Expanded areas of traffic congestion would disrupt surface Muni operations... Peak of the peak conditions would be expected to occur over longer periods by the year 2000." (Pg. IV.E.34,Para.3). The community services impact assessment (Pg.VII.F.4, Table F.3) indicates that there would be no additional demand for Police Department personnel in the C-3 district to regulate traffic in the year 2000. Also, no mention is made to potential impacts on fire and police department emergency response times. Given the transportation impact assessment for year 2000, the impact assessment in these areas should be re-examined. **F.2**

(415) 558-3671 Room 260, City Hall San Francisco 94102

4. Many of the transportation mitigation measures (Section V.E.) do not appear to be mitigation measures at all (measures 7,8,9, 18,20,22,36,46,50,51 and 52). These measures call for initiating studies, which in and of themselves cannot mitigate impacts. Perhaps these should be discussed separately? **E.6**

5. Mitigation measure 24 (Embarcadero Freeway Removal) should not be considered a transportation mitigation measure since it "could result in increased congestion on city streets." Perhaps this measure would more appropriately be included as a measure to mitigate land use or urban design impacts? **E.6.3.1**

6. A number of measures (19,24,27,28,41,45,48 and 49) proposed to mitigate one particular impact will actually exacerbate other impacts. For instance, the installation of additional Transit only lanes and streets (M.19) may require additional police enforcement to insure motorist compliance. This in turn will reduce available roadway for truck and auto circulation and/or curbside access, which could lead to delivery problems, increased congestion and the need for additional police control. Measures 41 and 45 will probably lead to requests for additional midblock crosswalks which could add to congestion and safety problems. The inter-relationships of these mitigation measures should be discussed to indicate the potential impacts of the proposed measures themselves. **E.6**

7. Measures 27 and 28 need much better definition to be understood and assessed. For instance, mitigation 28 proposes to channel auto traffic to primary vehicular streets. In the C-3 district, there are no primary vehicular streets connecting north and south of Market Street between Sixth Street and the Embarcadero. How is it proposed to divert auto traffic away from the in-between streets? The methods should be known in order to assess not only how successful the measure may be but also to assess how much the measure may impact other transportation and community services. **E.6.3.1**
E.6.3

8. Page 1.E.4,Para.1 and IV.E.34,Para.3 single out two of ten intersections analyzed in the downtown area as to impact on level of service. Is a discussion of two specific intersections within the downtown really appropriate in the context of this report? **E.3.2**

9. Page VII.E.2, last Para., assumes that policies on growth in the C-3 district would have no effect on development outside the C-3 district (the remainder of San Francisco and the region) that would impact the transportation network serving San Francisco. Wouldn't such an assumption tend to magnify the differences between alternatives and be a worse case assumption? **E.1.**

We hope our comments will be of help to you in finalizing the EIR.

Very truly yours,

Jeffrey Lee
Director of Public Works
and Clean Water Program

By
Frank H. Moss, Jr.
Deputy Director for
Engineering and
City Engineer

EAST MISSION IMPROVEMENT ASSOCIATION, INC.

SINCE 1949

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JEANNE BAGALA

May 15, 1984

RECEIVED
MAY 17 1984
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

Hon. Toby Rosenblatt
Planning Commission
City Hall
San Francisco, Ca. 94102

Dear Mr. Rosenblatt:

We, of the East Mission Improvement Assoc., Inc., reviewed several articles in the Downtown Plan of March 16, 1984 Environmental Impact Report, and found that the enviornmental effects of implementing the alternatives could be very significant in several areas. Z.1

When more offices are build, more people come to the
city daily, which effects our water systems, sewer
services, noise, odors, water runoff, water quality & J
its use. It also effects our schools, public F
transportation, our Recreation & Park facilities. E

We feel that more consideration should be given to the above areas. More serious thought should be given to the sewer department, since the more sewage we have the more it will cost the tax payers, which we feel are taxed too high now, especially the ones on set incomes, which are many in San Francisco. F.1

The report found these things insignificant, grant you, to outsiders it would be, but anyone living in the city would certainly think twice before giving a final approval on many of the subjects. J

We feel a large community cannot be planned without considering the invironment. Z.1

We feel the public review period is insufficient for
the public to respond to such a complex document,
therefore, our organization feels more consideration S.1.3
should be given, before it is accepted.

Sincerely,

Mrs Nevada Rebagliati
Mrs. Nevada Rebagliati
Corresponding Secretary

DR/NR

SAN FRANCISCANS FOR REASONABLE GROWTH
88 FIRST STREET, ROOM 600 • SAN FRANCISCO, CALIFORNIA 94105 • TELEPHONE: (415) 566-7050

RECEIVED
MAY 21 1984
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

DCP/OER
450 McAllister St.
San Francisco, CA. 94102

May 17, 1984

RE: Downtown Plan DEIR (EE 81.3)
General Comments on Transportation Section

The DEIR, in evaluating both the Setting and the Impacts of the proposed Downtown Plan, its Alternatives, and possible Mitigations, continues the seriously flawed practice that has constantly compromised the accuracy of the Transportation sections of all environmental impact reports prepared by the Department of City Planning. E

The problem is that the capcities of all the various transportation systems/routes - including freeways, roadways, bridges, bus transit routes, rail transit routes, and car pool/van pool systems dependant on road access - are rated as they exist now and/or as they are proposed for future development at theoretical levels that are not discounted to reflect the undeniable, documentable fact that in real life their average perfomance never acheives those levels. E.2.1 E.2.2.3

Thus the amount of transportation avaiable to offset the demands of new development is constantly overstated, hence seriously understating the negative impacts of that development. E.2.1 E.2.2.3

While projects are being approved one-by-one this issue is not dramatic. But given the obvious cumulative role of the Downtown Plan and its EIR that may never be repeated, this issue must be fully addressed in the EIR and all computations of capacity revised downward accordingly. E.2.1 E.2.2.3

Several examples should suffice to drive home this point. Nobody can claim honestly that the San Francisco Municipal Railway has consistently delivered its full schedule of service - and hence its capacity as identified in the DPDEIR - for any significant length of time in the last ten years. This results from several different types of causes: E.2.1 E.2.2.3

1. Lack of equipment to meet the schedule. Over the years these "maintenance crises" have been repeated at least three times, receiving great amounts of local press coverage. It is likely all scheduled "runs" have not been even started as much as 25% of all the workday rush hours of the past ten years. E.2.1 E.2.2.3

   Capacity should reflect the average equipment availability of a multi-year period. MUNI maintains such records. E.2.1 E.2.2.3

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May 17, 1984
OER: EE81.3
Page 2

2. All runs that are started are not fully completed. Most runs include several round "trips" on a given route or combination of routes, and on-the-street breakdowns - which we all repeatedly witness personnally - obviously reduce the number of those trips actually delivered. E.2.1 E.2.2.3

   Capacity then should be further reduced to reflect the average incidence of in-service equipment breakdowns for a multi-year period. MUNI maintains such records. E.21 E.2.2.3

3. Even when the equipment performs well, all scheduled trips are not fully completed. This is due to general traffic congestion and specific disruptions that cause transit vehicles to fall seriously behind their schedule. In some cases, vehicles are "turned back" before completing a full route, in others one or more trips per vehicle are never made. E.2.1 E.2.2.3

   Rush hour capacity should be even further reduced to reflect this everyday reality, especially in the IMpacts section since it is acknowledged that the Downtown Plan will seriously exacerbate street congestion. Gridlock conditions at key intersections can lead to occassional total failure of certain routes for periods in excess of one hour. E.2.1 E.2.2.3

4. These consistent capacity reducing circumstances apply to the MUNI LRV system as well. E.2.1 E.2.2.3

The fact that MUNI may propose to "solve" all these problems somehow in the future is not relevant to EIR analysis. Promised improvements, whether in a Five Year Plan or made by some elected official, have been offered over and over in the past, with the same dismal record of failure to meet those promises in fact. Only actual experience is a legally adequate basis, given this hard, brutal evidence, for EIR transportation analysis. Otherwise, "promises" could be offered that somehow transportation will be found to meet every ounce of demand that will be generated under the Downtown Plan, and those empty words used to justify a finding of negative transportation impacts that can be nonetheless accomodated. That would be fraudulent. E.2.1 E.2.2.3

As a matter of fact, that is what the DEIR does. The only new transit/transportation capacity expansions that can be legally included in the impact analysis are those that have full governmental approval and identified funding. Any others, such as the recent MTC "package" of proposed Bay Area rail transit expansions, can only be evaluated in the EIR under the "Mitigation" section as possible means to meet the negative impacts because they are not part of the Downtown Plan legislation, thus not legally part of the "project" being evaluated. E.2.1.1

May 17, 1984
OER: EE81.3
Page 3

Promises aren't gonna hold up in court, folks. Z.1

Is all this important? You bet. The best and most telling example is the public vote in 1961 (?) which approved the development of the Bay Area Rapid Transit System. At that time, the public was promised: E.2.3 Z.1

- Rush hour trains every 90 seconds (hence more system capacity then has ever or will ever be delivered); E.2.3 Z.1

- Reliable computer control and space age technology (with no forewarning at all of the constant equipment breakdowns and computer delays that have plauged the system and can never be, even BART now admits, totally eliminated - which further reduces system capacity compared to any schedule). E.2.3 Z.1

BART was approved by a bare minimum of the necessary 60% three-county vote. Can anyone claim, honestly, if the voters had been told accurately how actual service/capacity would probably have been significantly less than the "promises" that BART would have been approved? And BART, of course, is the system that did make possible the major development which has occurred in downtown San Francisco during the last 20 years. E.2.3 Z.1

So in 1961 no one knew better. But in 1984 we do. We can't make any more excuses, we must make our transportation capacity estimates as reasonably valid as possible, which means substantial discounting of all theoretical capacity levels. Becuase the EIR is meant to provide the Planning Commission, the Board of Supervisors, and the general public with such vital information that is needed for such extraordinarily important policy decisions as the Downtown Plan. E.2.2.3 Z.1

Of course these comments can be extended to all transit systems methodologically, and must be in the EIR. A similar methodology of discounting automobile transportation capacities, accounting for the massive traffic jams due to accidents, chemical spills, fires, and most commonly, bad weather can certainly be developed from data that is available and applied to the Setting and IMpact sections of the EIR. If you want to tell the truth, this must be done as well. E.3.1 Z.1

Sincerely,

John Elberling

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

AMEDA COUNTY
Joseph P. Bort
Fred F. Cooper
[illegible]
[illegible]
Frank H. Ogawa
RA COSTA COUNTY
omas J. Corcoran
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sanne Wilson
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n F. Cunningham
SONOMA COUNTY
Helen B. Rudee

Department of City Planning
City and County of San Francisco
450 McAllister Street
San Francisco, CA 94102

May 29, 1984

RECEIVED
MAY 30 1984
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

Attention: Environmental Review Office

Dear Sir/Madam:

We have reviewed the air quality and related sections of the San Francisco Downtown Plan DEIR. We have also discussed various aspects of it with your staff and consultants, both before and after publication. We welcome the cooperation afforded in this matter. **Z.1**

The analysis appears to have revealed the potential traffic and air quality impacts of the Downtown Plan. However, we believe that further clarification would be desirable. This would be particularly beneficial for estimates of future carbon monoxide (CO) concentrations. In the case of downtown San Francisco, CO is the most critical air pollutant. **I.4**

The 1982 Bay Area Air Quality Plan predicts attainment of ambient CO standards in San Francisco and in the rest of the Bay Area by 1987. The predictions are based upon trends and plans which preceded the formulation of the new Downtown Plan. Therefore it is quite important that the new plan be examined to assure that its impacts would not lead to exceedance of air quality standards. **I.4**

We believe that the DEIR would serve the public and planning decision-makers more fully if certain key assumptions, data, and conclusions were re-examined and made more explicit in the Final EIR. Among the questions which we recommend be addressed are:

1) For the study area, are assumptions and growth projections consistent with the 1982 Air Quality Plan, as adopted by ABAG, MTC, and BAAQMD? If there are differences, we suggest these be listed, with relative magnitude (percentage) and direction of the change. **I.3**

2) What is the rationale, vis-a-vis air quality, for the choice of the ten intersections for which carbon monoxide was modeled? Do these provide the likely worst-case situations or are there other intersections or points in the area--either north or south of Market Street--that might produce significantly higher concentrations of CO? **E.3.2**

3) What are the background levels and, separately, the local intersection-generated levels assumed or calculated at each point of analysis, for each of the years analyzed? **I.4**

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4) At street intersections analyzed, does not a degradation in the Level of Service, as shown for many of the intersections in the traffic analysis (Table IV.E.5.), mean a lower average vehicle speed, more idling, and more acceleration and deceleration? Do the decreased emission rates from a "cleaner" vehicle fleet still offset emissions from increased traffic, plus impairment of all traffic flows, in future years? What are the average speed, idling, and acceleration/declaration assumptions for each analysis year (Table IV.I.3)? **I.4**

5) For the background level of CO, does not total projected increased traffic for the downtown and for nearby freeways mean a slowing and impairment in 1990 and 2000? Would impaired flow plus increased traffic emissions be completely offset by the cleaning up of the vehicle fleet (Table O.1)? **I.4**

6) The Levels of Service at the ten analyzed intersections for the years 1990 and 2000 "are calculated on the basis of (modal-split) goals of the Downtown Plan not being achieved" (page IV.E.37--footnote c). If the projections are not based on Plan modal-splits and not on present splits, then what are they based on? Would it not be prudent to also model a worst-case situation based on the current modal-split ratios, including the current "drive-alone" proportion of downtown trips, under maximum allowable development levels? **E.1.4**

7) If it turns out that, under worst-case circumstances, the national or state standards for CO are calculated to be exceeded, what mitigation measures would be introduced to avoid such violations? Are there additional feasble transportation control measures or transportation system management measures that would be adequate? Would it be necessary to place further constraints on the future levels of urban development? **E.6** **I.7**

The analysis methodology used is based on a disaggregated rollback of background and local carbon monoxide levels. If the method is to be a precedent for subsequent environmental impact assessment in the San Francisco downtown, we suggest that a technical appendix be attached to the EIR. It would include the specifics of application of the model to this area, beyond the generalized and other city applications in Air Quality Planning Program Technical Memo 43. **I.4**

If you have questions, please contact Irwin Mussen, Senior Planner in our office.

Sincerely,

Milton Feldstein
Air Pollution Control Officer

MF:ey

cc: A. Geraghty, ARB
R. Wada, ABAG
MTC

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RECEIVED
MAY 3 1 1984
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

May 23, 1984
W.I.: 902.90.01

City and County of San Francisco
Department of City Planning
450 McAllister Street
San Francisco, CA 94102

Attn: Mr. Alec Bash

Subject: Draft EIR, Downtown Plan

Dear Mr. Bash:

This letter transmits MTC staff comments on the Draft EIR.

1) The key of the "Transportation and Circulation" section of the DEIR is the computer model used to forecast future travel demand and the assumptions in that model on mode-split and vehicle-occupancy. MTC, in conjunction with ABAG, has developed projections of future land use and travel demand. The EIR should provide comparison's between the different land use and travel projections provided by ABAG/MTC and those in the EIR, as follows: B.1.2

   - Compare the results of the travel surveys in terms of total travel demand, peak period demand, and current mode-split. E.1.1.2

   - Compare future home-to-work travel demand for the year 2000. E.1.1.2

   - Compare cumulative office and commercial development in San Francisco in the year 2000 in the EIR to ABAG's "Projections '83". This should include projected development throughout San Francisco, including the Downtown Plan, Mission Bay, and development in the neighborhoods. B.1.2 B.2.1

2) The assumptions used in the discussion of Air Quality are unclear. Given the high level of congestion on the freeway system and surface streets feeding onto the freeways, plus the congestion in the downtown area (see Figure IV.E.3), it would seem that violations of CO standards would occur at these highly congested intersections. The Final EIR should indicate the assumptions on traffic congestion used in the CO analysis, and if needed, modify that analysis. I.3

3) The section on Mitigation Measures for Transportation and
Circulation is primarily composed of a list of improvements
already proposed by other agencies. These are not measures
designed to mitigate the impacts of the downtown plan, and
therefore would be more appropriately discussed either in
the impact section, or in a separate section on "plans and
policies of other agencies." Furthermore, the assumption
that all of the planned improvements by all of the operators
will be implemented by 1990 is optimistic, given the limits
on funding available to the region. The EIR should discuss **E.1**
the possibility of delays in implementing the Five Year **E.2**
Plans. **E.6**
S.1

4) The discussion of cumulative impacts based on the projected
market demand for office space is a major innovation, but
tends to cloud certain issues. MTC is specifically concerned
that implementation of the proposed Downtown Plan will result
in congestion of all transportation systems, which will
present a major obstacle in the implementation of other very
large scale proposals, such as Mission Bay. Referring to a
projection of future market demand helps quantify future
impacts, but does not assist the local elected officials or
regional entities in evaluating trade-offs between approval **B.2**
of different proposals, whether at the individual office **B.2.1**
building level or the larger Downtown Plan or Mission Bay **B.2.2**
level. The EIR should be revised to clarify the relationship **E.1.1**
of future transportation capacities to reasonably foreseeable **E.1.5**
future development, i.e., the Downtown Plan and Mission Bay. **E.1.7**

5) The list of transportation mitigation measures that could be completely, or at least primarily, implemented by San Francisco is very brief. This list appears to focus only on those measures already proposed in the Downtown Plan, rather than describing and evaluating additional measures which could be added to the plan. The following are just a sample of the types of measures that could be implemented.

- The attached chart, titled "Suggested Commute Alternatives Program for New Development as a Function of Cumulative Employment," provides a list of ridesharing incentives that could be incorporated into the Downtown Plan. **E.6**

- Develop a policy and methodology for calculating the marginal cost of each individual project, and requiring that project to generate sufficient revenue to offset those local and regional costs. **E.2.7.1**

- Develop a policy linking the granting of building permits to the availability of unused capacity on the freeway and transit systems serving the downtown area. **P.2.1**

MTC appreciates the opportunity to review the Draft DEIR, and would be pleased to expand on or explain any of the above comments, or otherwise assist in improving the discussion of transportation in the EIR. We look forward to receiving the Final EIR.

Very truly yours,

Jeff Georgevich

Jeff Georgevich
Environmental Review Officer

JG/kb (9384P)
Attachments

cc: ABAG Clearinghouse
BAAQMD
Caltrans, Dist. 4

May 28, 1984

RECEIVED
MAY 3 1 1984
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

Mr. Alec Bash
City Planning Department
450 McAlister Street
San Francisco, Ca. 94102

Dear Mr. Bash:

I am writing to you concerning the Environmental Impact Report for the current Downtown Plan. Enclosed please find a document containing several questions raised about the EIR for the Downtown Plan. I would like to bring these questions to your attention, and would be interested in the Planning Department's response to these issues. I would also be interested to know how and when these issues might be addressed and incorporated into a revised EIR and/or Downtown Plan. **S.1.1**

In addition, I would like you to know my opinions on the discussion involving the City's building a new sports stadium downtown:

1. State or local governments should not have as a priority (high or low) the building of facilities primarily for the use of private enterprises. The Giants and the 49ers do add to the stature of the City and do provide a desirable form of entertainment, but surely the scarce financial resources of the City could be better used to improve the more basic needs of a livable city: quality public transportation, quality public education, the lowest possible crime rate, and more. **Z.1**

2. An observation: the most successful and best stadiums for baseball (Fenway Park in Boston, Wrigley Field in Chicago, and Dodger Stadium in Los Angeles) are all significantly smaller than Candlestick. They are al[illegible] not publicly - owned. They are also the most stable franchises. Having sports entrepreneurs [illegible] goes a long way toward making them [illegible] more responsible corporate citizens. **Z.1**

Yours very truly,

Mel Bachmeier

Mr. Mel Bachmeier
[illegible] Avenue
San Francisco, Ca. [illegible]

TESTIFYING ON THE DOWNTOWN PLAN

- Your comments don't have to be technical. Put forth your VISION for what San Francisco should be. Get your VALUES and concerns into the record. Question the EIR's assumptions (e.g., that all growth must be good).

- Discuss what you don't like about what's going on downtown.

- Disagree with the value judgments made in the Environmental Impact Report (EIR).

- If there's something you don't understand, ask for clarification.

- Propose your own zoning measures, alternatives, mitigation measures.

- Ask "Quality of Life" questions. They may not be answerable (for example, "how much more commuter traffic do we have to put up with!"), but they raise the issues and show our concerns.

- Put forward any data (even half-baked!) or opinions you have. You don't have to be correct! Make the City respond!

- Think of ways in which downtown problems relate to you. Use your experiences. Ask friends for their experiences. (E.g., "The N-Judah is already jammed. How do you expect it to handle 30% more passengers?")

- Be outraged! ("What do you plan to do about this horrible parking mess? Rents are already outrageous, and now you plan to double the number of workers downtown?!") Say that you've had enough of this mess!

- Make simple analogies, or use simple examples which show how inadequate or incorrect the EIR is. Use common sense to question the assumptions.

- What doesn't the EIR say? (You are almost better off not reading it, so your thoughts won't be narrowly channeled.) For example, rental housing impacts, blue-collar job losses are never addressed.

- Talk about the need for an annual limit, and for downtown to pay its own way.

- ET PEOPLE TO COME TO THE HEARING. The Downtown Plan will determine the future irection of the City. S.1.1

COMMENTING ON THE PROPOSED DOWNTOWN PLAN

The San Francisco City Planning Commission will hold just one public hearing on the Downtown Plan, on Thursday, April 26, beginning some time around 1:30 p.m.. We encourage you to make your concerns on this extremely important issue known to the Commission.

If possible, plan to testify in person. Alternatively, written comments can be submitted through May 3rd to:

Department of City Planning
450 McAllister Street, 5th Floor
San Francisco, CA 94102.

For more information, contact:

Sue Hestor 362-2778 or 552-2194
David Jones 826-6084
or Dale Carlson 781-7430. **S.1.1**

Nob Hill
Neighbors

June 1, 1984

Mr Toby Rosenblatt
President,
City Planning Commission
450 McAllister Street
San Francisco CA 94102

Dear Mr Rosenblatt:

The draft EIR on the proposed Downtown Plan is inadequate and incomplete in its analysis of housing impacts which will follow from the planned level of development.

As one of the closest residential areas to downtown, the Nob Hill neighborhood has already suffered significant housing impacts resulting from the cumulative downtown office construction that has taken place to date. These impacts take several forms, including upward pressure on rental rates and continuing pressure for condominium conversion. After controls were established for condominium conversions, proposed demolition of rental housing for replacement with new condominiums became a popular approach. B.4.2

The most severe impact (and one which is not regulated by the city at the present time) is the trend toward conversion of rental apartments into short-term "executive suite" rentals and time-share accommodations for business travelers. It is this impact that is the focus of our comment. This impact must be fully investigated and mitigated prior to approval of the Downtown Plan. B.4.2

The first conversions to short-term rentals occurred on Nob Hill in the late 1970's. Nob Hill Neighbors has monitored this activity since 1980. Since that time, we have confirmed the conversion of some or all of the apartments in 19 buildings, which contain a total of about 768 units. These figures represent only those Nob Hill conversions which we have been able to verify by means of advertisements or contact with management. We have information that more such buildings exist. These conversions are difficult to detect and verify; they are often carried out surreptitiously, and do not go through a permit process. We have heard reports of similar activity in other neighborhoods. B.4.2

The conversion of residential apartments to short-term accommodations is already taking place at an alarming rate. The cumulative effect of office construction, either approved, under construction, or contemplated in the Downtown Plan, will add significantly to the potential for additional conversions. The result will be displacement of current residents, personal hardship, and a tangible lessening of the quality of life for residents of this once residential neighborhood. B.4.2

Nob Hill Neighbors strongly urges that these impacts be investigated, documented, and mitigated prior to approval of the Downtown Plan. We have accumulated a considerable data base on this subject, some of which is attached herewith. We remain at the disposal of the city's staff and consultants and will assist in any way we can to bring about disclosure of these impacts.

PO Box 99496 San Francisco 94109 673-0668

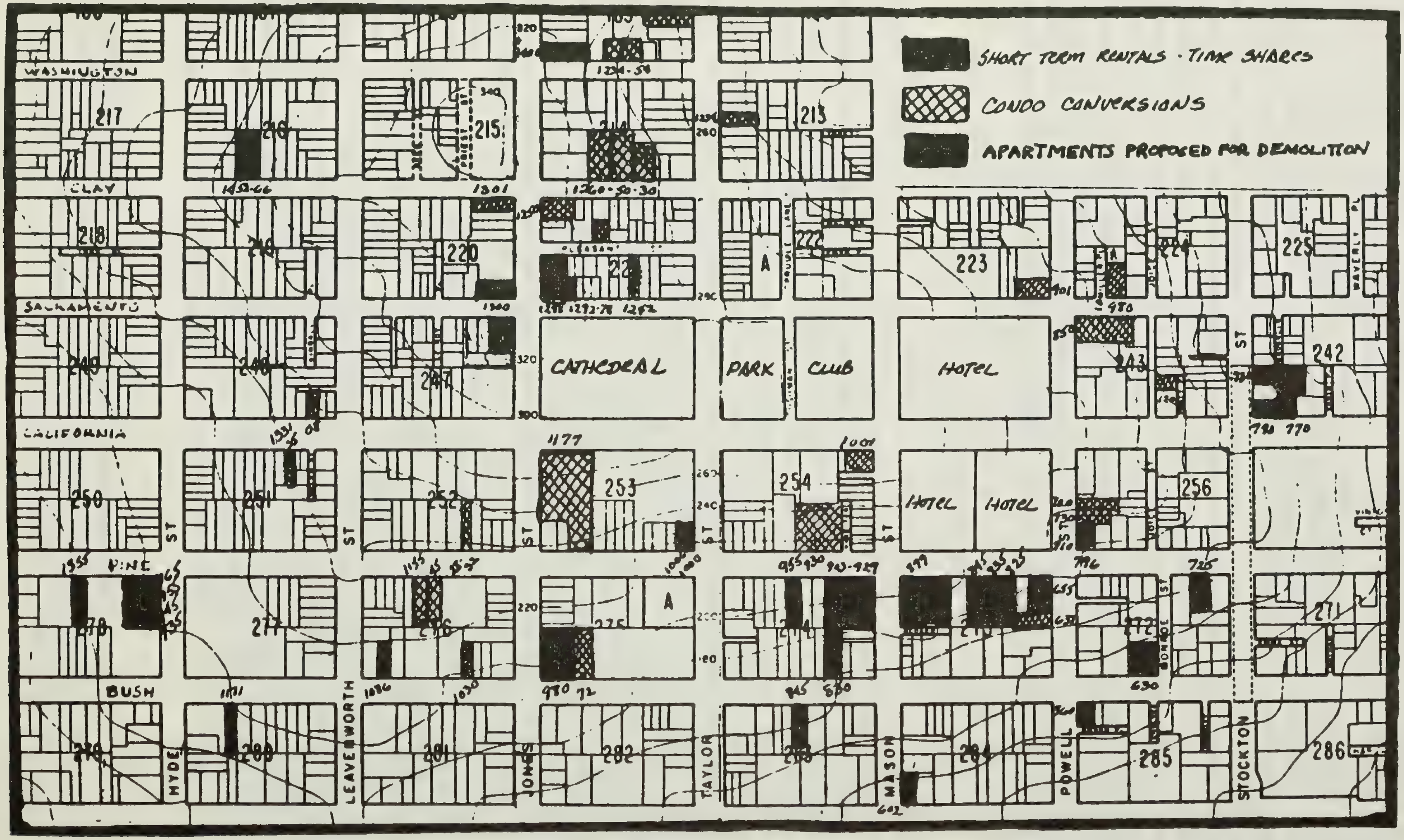
Thank you for your attention to this matter.

Sincerely,

Linda I. Chapman

LINDA I. CHAPMAN
Vice President

Enclosure


SHORT TERM RENTALS · TIME SHARES
CONDO CONVERSIONS
APARTMENTS PROPOSED FOR DEMOLITION
WASHINGTON
CLAY
SACRAMENTO
CALIFORNIA
PINE ST
BUSH
HYDE
LEAVENWORTH
JONES
TAYLOR
MASON
POWELL
STOCKTON
CATHEDRAL
PARK
CLUB
HOTEL
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This map shows some of the sites where rental housing has been lost or threatened in the central Nob Hill area.

Yellow lots represent apartment buildings that had converted to condominiums as of April, 1983.

Red lots represent buildings converted to short-term accommodations, such as executive suites, timeshares, and bed-and-breakfast hotels. These sites include buildings that are fully converted or in the process of converting, as well as one failed conversion. This map shows only locations reported to Nob Hill Neighbors. Since many of these conversions take place without a permit, there may be others of which we are not aware. Details appear on the following pages.

Green lots represent apartments proposed for demolition since 1980. The map shows only sites where a substantial loss of rental housing would result (i.e., 5 units or more). Demolitions are represented here only if the purpose was

Nob Hill Demolitions Proposed Since 1980
(Includes only projects which would remove five or more rental units)
Date compiled by Nob Hill Neighbors, revised June, 1983

1300 Sacramento: 22 apartments

In 1980 the developer proposed to replace 22 studio and one-bedroom apartments (renting at about $210-300) with a highrise containing 12 3700-square-foot condominiums which Nob Hill Neighbors estimated would sell for about $1 million or more. After acquiring the building in 1979, the owner ceased to rent vacant apartments. The building had housed a number of elderly people and long-term tenants (e.g., 35 years, 15 years). Property managers Hogan and Vest issued eviction notices in May, 1980. Tenants received $200 and two months' free rent; some allege intimidation. The building was vacated by September, 1980, before the owner applied for permits although Planning Department staff had warned proposal was not likely to be approved. The owner's agents claimed extensive rehabilitation would be required to bring the present building up to code. However, city records showed that the building had been officially recognized for architectural merit and showed no significant code violations. The Planning Commission denied a conditional use permit unanimously on November 6, 1980. In 1981 the owner submitted a new proposal to construct a highrise with 24 condominiums and provide "replacement rental housing" at another location. Meanwhile, apartments at 1300 Sacramento remained vacant, and neighbors complained that the building was neglected, taken over by transients, and subjected to vandalism and minor fires. The Planning Commission granted the new proposal a conditional use permit in March, 1982. After an unsuccessful appeal to the Board of Supervisors, Nob Hill Neighbors and others filed suit in superior court on the grounds that the project did not conform to the city's Master Plan, required an Environmental Impact Review, and established a precedent which threatened architecturally distinguished buildings, rental housing, and the integrity of conditional use requirements, which protect neighborhoods and property owners.

1400 Jones: 18 apartments

In 1980 developers proposed to replace 18 low-rent family-sized apartments (4-5 rooms) with 16 condominiums selling at up to $500,000. The building provided affordable housing for a socially and racially integrated population of Chinese, Japanese, Latinos, whites, elderly people, three-generation families, gays, and middle-income workers. Most tenants were long-term residents (e.g., 52 years, 25 years), who had invested a considerable amount of money and labor in their apartments. In October, 1979, property managers Hogan and Vest notified tenants to leave, offering one month's free rent; tenants won additional compensation after organizing to oppose this arrangement. Most units were emptied before the developers applied for permits, and more tenants were required to move after the Planning Commission warned in November, 1980, that a conditional use permit was not likely to be approved. The owner's agents used past neglect as an excuse to justify demolition, claiming rehabilitation would cost $1 million and require rents of $1000; however, they would not agree to a city building inspection. The Planning Commission denied the conditional use permit January 8, 1980. Faced with widespread opposition, the owner abandoned an appeal to the Board of Supervisors in March, 1981, but the fate of the building remained in doubt. Tenants remain in two apartments, keeping intruders out of the nearly vacant building.

1278 Sacramento
1298 Sacramento
1208-10 Jones
1212 Jones
83-89 Pleasant

Proposed demolitions have varied from 3 buildings (7 apartments) to 5 buildings (21 apartments)

Since 1978 there have been several formal and informal proposals to demolish apartments at this site across from 1300 Sacramento for replacement by condominiums. Landmark status of 1298 Sacramento complicates plans for demolition. Developers suggested alternative schemes which included demolishing all five buildings; getting the landmark and demolishing the four; or preserving the landmark and 1278 Sacramento while demolishing three small buildings located on Jones and Pleasant Streets. In May, 1982, the Planning Commission approved a proposal to demolish five rental units at 1212 Jones and 83-89 Pleasant Streets for replacement by 10 condominiums. The developers had planned to demolish two flats at 1208-10 Jones as well; but the Commission required them to preserve that building and construct two additional rental units on the site to accommodate tenants displaced by the Pleasant Street demolition. However, the developers asserted that they should be allowed to demolish three rental buildings as originally proposed, in return for providing "replacement housing" at some other location in accordance with the precedent set by the 1300 Sacramento project. After receiving the conditional use approval and upzoning they sought, the developers advised City Planning staff that they intended to proceed with their original plan to demolish three rental buildings. Because the new proposal for the site differs significantly from the one approved by the Planning Commission, the developers were told it would require new public hearings.

770 California: 56 apartments
790 California: 27 apartments
730 Stockton: 18 apartments

In February, 1981, Jack Webb of J.W. Associates contacted the City Planning Department, Nob Hill Neighbors, and another community group about a proposal to demolish 101 low- or moderate-rent apartments for replacement by condominiums, offices, or a combination thereof. These buildings provide housing for an integrated population, largely white and Asian. Neighbors indicate that residents include many elderly people. The developer wanted to know if there was likely to be significant opposition to this plan. After being informed about the recent defeat of proposals to demolish 1300 Sacramento and 1400 Jones, he apparently abandoned the plan without submitting a formal proposal.

1452-66 Clay: 24 apartments

The owner proposed to construct 21 condominiums in place of two buildings which provide low-rent housing primarily to Asian families and long-term tenants. This project was abandoned after initiation of the permit process in the spring of 1980.

RESIDENTIAL UNITS ON NOB HILL LOST OR THREATENED BY CONVERSION TO TRANSIENT USE

Data collected by Nob Hill Neighbors, revised June, 1983

Hotel Louise, 845 Bush

Formerly 28 low-rent apartments housing primarily minority tenants and families. New owner used eviction notices, intimidation, and trickery to vacate apartments in 1979. Hotel permit issued by BBI 11/20/79 between passage and signing of moratorium on residential hotel conversions. Brochure advertises rooms with kitchens, continental breakfast, and the "personal service found in intimate European hotels." Daily rates $45-65 (1983); weekly rates available. "San Francisco's unique small hotel is ideally situated in the quiet residential section of Nob Hill." RC zoning.

Grosvenor House, 899 Pine

Formerly 208 moderate-rent apartments. Starting in 1978 tenants organized against owners' plan to convert building to a hotel. Proposed alterations for hotel conversion did not win Planning Commission approval. However, owners proceeded to consolidate some apartments and advertise vacated units for business travelers on short-term month-to-month vasis. Studios, one- and two-bedroom apartments rent for $800-$3000, with a one-month minimum (1983 rates). Some may be leased to corporations for business travelers. Owner announced intent to convert entire building as units are vacated. By 1983 about half the apartments were short-term rentals. Dual hotel/apartment permit was changed to hotel permit in BBI records (1983). Residential zoning.

903-929 Pine

86 apartments. Same owner and management as Grosvenor House (899 Pine). Available as short-term suites, minimum rental one month. One-bedroom apartments available from $850 (5/83), studios and larger apartments also available. Apartment permit. Residential zoning.

Powell Suites, 560 Powell

BBI records show 29 apartments. About 1979 residents paying under $200 a month were notified to vacate "for remodeling" and promised they would be able to return. Those who tried to reclaim their apartments were told they now rented only on short-term basis at greatly increased rents. Owners later attempted to force out new short-term tenants who showed signs of becoming permanent residents. Daily rates: Studios $60-70; one-bedroom $70-80 (1983). Weekly and monthly rates available. This is one of three buildings operated under the name Nob Hill City Suites. Timeshare application filed with State 9/22/81 under the name of "San Francisco Suites at 560 Powell Street." Building was advertised for sale in Wall Street Journal (4/22/83); "27 executive apartment suites and 2 stores. Hotel and timshare approvals." Apartment permit. Commercial zoning.

Powell Place, 720 Powell: 10 apartments
730 Powell: 18 apartments

Powell Place illegally converted to a tourist hotel. After being caught, owners filed for State approval of timeshare plan 11/28/80 and iniated an extensive sales campaign. 1400 shares were offered to corporations and individuals, each share entitling the owner to occupy Powell Place for one week annually. Owners could reserve units for as few as two days and trade their right to occupy Powell Place for time at "over 300 other prestigious resorts worldwide." Units not occupied by "owners" were rented at a daily rate. Management admitted to newspaper reporters that Powell Place was essentially a hotel. In 1983 management denied renting accommodations; but further investigation indicated weekly rental rates of $560 for studios and $812 for one bedroom apartments, with no tax added. 720 Powell has an apartment permit; 730 Powell was issued a permit of iccupancy as a condominium building in 1983. Residential zoning.

Powell Pine, 655 Powell

BBI records show 48 apartments. Gradually converting to tourist use as residents vacate apartments. Neighbors reported attempts to encourage residents to vacate (e.g. illegal rent increases to elderly tenants). By 1983 suite titles rather than residents' names appeared by most doorbells. Daily rates: Studios $55 and up; one bedroom $80 and up (1983). Weekly and monthly rates available. Apartment permit. Residential zoning.

825 Pine: 16 apartments
835 Pine: 16 apartments

Both buildings, under the same ownership, were vacated in 1979. Neighbors report that tenants moved after a series of small fires, which resulted in numerous responses from the Fire Department. Apartments now rent as short-term suites. Weekly rate: $250; monthly rates $850-900 (1983). Apartment permits. Residential zoning.

1155 Jones

51 apartments, per report of tenants; some are sleeping rooms with bath, split off from larger apartments and possibly illegal. Early in 1983 a developer approached the Planning Department and Nob Hill Neighbors with an idea for demolishing the building to construct condominiums. About the same time vacated units were furnished and offered as fully accessorized short-term accommodations, with a minimum term of one month. Monthly rate: studio $850 on a short-term basis (1983). Apartments also advertised for lease. Apartment permit. Residential zoning.

502 Mason

BBI records show 22 apartments. Gradually converting to short-term rentals. Monthly rates: studios $960, one bedroom $1360 (1983). Daily and weekly rates available. Apartment permit. Commercial zoning.

NOB HILL CONDOMINIUM CONVERSIONS

(FROM SUBDIVISION LOG, DEPARTMENT OF CITY PLANNING)

Address	No. Units	Date Approved
1250 Jones	45	12/22/72
1230 Clay	12	*
1250 Clay	24	*
1260 Clay	25	*
1177 California	255	2/28/75
1520 Taylor	31	3/15/76
1301 Clay	6	2/28/77
850 Powell	40	4/29/77
637 Powell	12	8/9/77
930 Pine	45	10/13/77
980 Sacramento	42	1/8/79
120 Joice	7	1/8/79
1155 Pine	16	4/2/79
1545 Broadway	24	5/21/79
1234 Taylor	6	5/21/79
1234-1254 Washington	9	7/9/79
1242 Sacramento	6	11/21/79
720 Powell	10	11/29/79**
730 Powell	18	11/29/79**
1073-75 Broadway	2	12/12/79

---

* Conversion approved 1974; not shown in Subdivision Log.

** Approved for condominiums; sold as timeshares.

COALITION FOR SAN FRANCISCO NEIGHBORHOODS
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SAN FRANCISCO, CALIFORNIA 94101

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Vice-President
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Treasurer
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Babette Drefke
Recording Secretary
282-5919
Lion Kuntz
orrespondence Secretary

Alamo Square
eighborhood Association
Cow Hollow Association
Diamond Heights
Community Association
Duboce Triangle
eighborhood Association
East and West of
Castro Street
Improvement Club, Inc.
East Mission
Improvement Association
Eureka Valley
Promotion Association
Eureka Valley Trails
and Art Network
Friends of Noe Valley
Glen Park Association
Golden Gate Heights
eighborhood Association
Golden Gate Valley
eighborhood Association
Greater West Portal
eighborhood Association
Haight Ashbury
Improvement Association
Haight Ashbury
Neighborhood Council
Inner Sunset Action
Committee
Jordan Park
Improvement Association
Lakeshore Acres
Improvement Club, Inc.
La Raza en Accion Local
Mission Creek Harbor
Association, Inc.
Nob Hill Neighbors
Pacific Heights
Neighborhood Council
Pacific Heights
Residents Association
Parkmerced Residents
Organization
Planning Association
for the Richmond
Potrero Boosters
d Merchants Association
Potrero Hill League
of Active Neighbors
Russian Hill
Improvement Association
Russian Hill Neighbors
Sacramento Street
ighborhood Improvement
Association
South of Market Alliance
Stanyan-Fulton Street
eighborhood Association
Sunset Neighbors United
unset-Parkside Education
and Action Committee
Temescal Terrace
Association
Tenderloin Neighborhood
Association

June 4, 1984

RESPONSE TO THE HOUSING IMPLICATIONS IN THE DRAFT ENVIRONMENTAL IMPACT REPORT ON THE DOWNTOWN PLAN

By the CSFN Housing Committee

Housing costs in San Francisco are among the highest in the United States. They have increased at a far greater rate than the rest of the nation during the past fifteen years, a time that coincides with accelerated development of the City's downtown commercial sector. The CSFN believes that, notwithstanding the attractions of San Francisco and the life-style and demographic changes that have occurred during the 1970s and the more recent changes in mortgage financing, downtown commercial development has been a significant cause of our increased housing costs. **D.3.1**

The Coalition notes with trepidation the finding in the Draft EIR (DEIR) that the City will not be able to provide sufficient housing to accommodate the numbers of people who want to reside here, apparently including many current residents. We are fast approaching the point where more than one-half of the City's employees will live outside the City, many only because they cannot afford our housing costs. We foresee increasing competition for a limited housing supply driving up costs at an increasing rate and driving low and moderate income residents from the City. We foresee tremendous **D.2.1**
pressures to increase densities of existing neighborhoods. We are **D.3.1**
disturbed that the DEIR appears to accept these impacts as a fait **D.3.3**
accompli.

The Housing Element of the DEIR raises more questions than it answers. We believe that the answers must be provided if we are to be remotely assured that our worst fears will not be realized. Our specific comments follow: **Z.1**

1) The CSFN believes it necessary that the DEIR set forth a viable housing program to meet the needs or present residents and to keep housing cost increases under control. The DEIR's antiseptic approach gives us much concern. Almost no effort appears to be given to strategies to increase housing production. Most significantly, the DEIR fails to address the housing potential of Southern Pacific's Mission Bay site. If primarily reserved for housing, that project can substantially assist in meeting the City's housing needs. (These needs are far in excess of the housing goals set forth in the DEIR.) **D.5**

2) The DEIR states that the location of new housing development in the Bay Area will have an increased effect on the locational distribution of the expanding supply of labor and that the most potential for housing development, particularly in the more affordable price ranges, exists at the periphery of the region. The DEIR acknowledges that many people would like to live in San Francisco if they could afford to, and that many current residents will not be able to afford the City's escalating housing costs. But East Contra Costa County is also experiencing tremendous commercial growth, and it might be that the anticipated affordable housing might not be available; housing costs at the periphery may rise, similar to what is expected in the City. The DEIR does not assess the likelihood of this happening or the consequences if it does. **D.3.3.4**

The DEIR should assess the consequences if anticipated housing for families and rental housing do not become available within the region. **D.3.3.4**

3) Housing affordability will be an increasing problem. The DEIR should provide
more specific information as to the fffects on housing affordability of various
alternative demand scenarios and of alternative housing production scenarios. **D.3.1**
We should be provided with projections of monthly rental and housing costs **D.3.2.3**
(expressed in 1984 constant dollars). **D.3.3.4**

The tremendous commercial growth taking place in Contra Costa County and in **D.4**
Silicon Valley casts doubt on the ability of San Francisco employees to find
affordable housing outside the City. A recent report in the San Francisco **D.3.3.4**
Chronicle (May 7, 1984) noted a new trend -- Silicon Valley employees moving to **E.1.4.3**
San Francisco to take advantage of the reverse commute! **E.3.1**

This trend suggest that there will be a tremendous unmet demand for housing with renewed escalation of ownership and rental costs in San Francisco and the entire region. Further, these factors will likely mean even stronger pressures to increase densities in existing neighborhoods. The DEIR discussion of housing fails to specify the impacts on neighborhoods, particularly in the western portion of the City. While many of the additional employees living in these areas may simply reflect increased numbers of C-3 workers per household (we find the 55% projection somewhat difficult to accept), the data implies that additional units of housing, perhaps in significant numbers, are contemplated in existing neighborhoods. **D.3.1**

We believe that the DEIR should discuss in detail the likely impact on existing San Francisco neighborhoods of increased housing production. **D.3.1**

4) The housing data also makes it virtually certain that we can anticipate seeing gentrification on an accelerated level, with higher income persons replacing lower income employees. We believe that the DEIR should discuss this phenomenon, suggesting which areas of the City and which resident groups are most susceptible to gentrification pressure. We recognize that this is not a politically easy task or a popular one. But San Franciscans are being asked to make significant decisions about their future; in the process of deliberation we have a right to expect that all the potential social and environmental impacts be disclosed. **D.3.1** **D.4**

5) The DEIR should contain population projections for 1990 and 2000 based on alternative housing strategies. Population data for the City's quadrants should also be shown and should be broken down demographically and economically. The projections should indicate changes in the numbers of children, families, senior citizens, etc. **D.1** **D.3.1**

The DEIR should also examine the issue of existing neighborhood densities. Will they be increasing? It would seem possible from the projected increase in the number of households, even if most new housing is built in the eastern portion of the City. (See pages IV.D.59-60.) We request more specific information as to where increased densities and infill residential development are anticipated. **D.2.2** **D.3.1**

We request information on the number of new households by City quadrant. We also request that those neighborhoods be identified that are anticipated as absorbing:

a) the greatest absolute number of new households, and
b) the greatest percentage increase of new households. **D.3.1**

6) The DEIR suggests that the resident patterns for construction, building maintenance and security employees were not surveyed, but would probably show and average or higher than average percentage of City residents (page IV.D.5). What are the projected residential patterns for these groups in 1990 and 2000? Will most of these employees be ilkely to acquire housing outside the City? **D.2.7**

7) In evaluating the effectiveness of possible City strategies and mitigations, it would appear necessary to know why current residents who continue to work in San Francisco decide to move outside the City. Is the issue one of cost? What are the economic and demographic characteristics of those persons who move from the city without changing their place of employment? Similar information should be provided with respect to new residents of the City. It would be helpful to know what significance the availability of employment or existing job commitments has on their decisions. **D.2.10**

8) Page IV.D.61, in discussing forecasts of net housing additions, refers to taking into account "other proposals from the City's Residence Element to expand the supply of housing in several areas near to the C-3 District." What specific proposals are referred to? **D.2.2**

9) The DEIR indicates that there is likely to be a better "match" between job growth and housing growth in San Francisco in the future than has occurred in the past because of a larger addition of housing (page IV.D.78). To what extent does this projection take into account the proportion of City residents who will fill the approximately 100,000 jobs in the City outside of the C-3 District? **D.2.9**

Housing is particularly sensitive to cumulative development effects. To identify housing impacts, and to propose meaningful mitigation measures, all the contributory factors must be addressed. Thus, the housing portion of the EIR should discuss the cumulative impacts of C-3 and non-C-3 employment growth on the City's housing conditions. **D.2.2** **D.2.5**

If the City provides only 20,000 units of housing, but one-third of the 200,000 persons filling new jobs (C-3 and non-C-3 employment growth) wish to live in the City, we are concerned that severe demand pressures will be placed on the San Francisco housing market, leading to substantial increases in housing costs and to displacement of lower and moderate income residents by the more affluent. If one focuses on total employment growth, not just C-3, to what extent are these concerns valid? What are the underlying data projections with respect to non-C-3 employees residing in the City? **D.2.5**

10) The "match" of people to housing is expected to improve in the future (page IV.D.78). What if it doesn't? Will San Francisco be left with a glut of expensive condominiums used as tax write-offs for large corporations while the people needing housing cannot afford the high-cost housing that is available? What income levels (in 1984 constant dollars) will be necessary to purchase housing in San Francisco in 1990 and 2000 (using alternative scenarios)? **D.3.1** **D.3.3.5**

11) Assuming 20,000 new housing units are constructed in San Francisco by the year 2000, what conditions would prevail in terms of housing availability and affordability? What if 30,000 units were constructed? What if only 15,000 units were constructed? Is it not feasible to put together a matrix projecting significant housing "indicia" based upon alternative housing scenarios? **D.3.3.2**

12) To adequately assess housing-related impacts a housing "discomfort index" (not unlike the transportation indices to describe transit crowding conditions) should be developed. In dealing with the housing issue over time, the Coalition believes it necessary to establish base-line data that we can use as a point of reference. Obvious components would include: vacancy rates, household density, population density, and cost indices relative to the cost of living (for both rental and ownership housing). The indices should also include demographic information. **D.1**

13) A major problem with the DEIR, one that relates to issues areas besides housing, is that it fails to consider alternative growth management plans for the C-3 District. We feel that it is imperative to know the impacts of an annual growth limit plan as well as a plan that ties growth to the City's ability to serve the needs generated by that growth. The latter plan would require the establishment of indices for transit carrying capacity and auto congestion as well as the housing adequacy indices mentioned above. **P.1** **D.5** **P.1** **P.2**

Conclusion

The DEIR portrays San Francisco as a community whose soul is available to the highest bidder. The housing discussion in the DEIR glibly smooths over the problems and takes a laissez-faire attitude to possible mitigations and an effective public sector role. **A.1** **D.3.1** **D.4** **D.5** **Z.1**

The Coalition recognizes that the City is going to have to increase its fiscal commitment just to manage — not counting any direct involvement in development -- its housing responsibilities. The City needs to be spending more energy in determining how to meet the housing needs of its citizens. The resources within the Mayor's Office and the Planning Department are woefully

D.3.1
inadequate, given the immensity of the task (and the energy and effort spent **D.4**
by the public sector on other matters, some of which have an adverse impact on **D.5**
City housing conditions). **Z.1**
Z.3

The DEIR avoids discussion of controversial issues such as: Where will
new housing be built? How many current residents will "choose" to leave San
Francisco because of housing costs? What if housing at the periphery of the
Bay Area is not available at affordable prices? How will the quality of life **D.1**
be affected? Avoidance of these questions is not acceptable to the Coalition. **D.2.6**
We demand that the housing sections of the DEIR be revised so that the perti- **D.3.1**
nent facts and projections are brought into the open for public review. The **D.3.3.4**
citizens deserve no less, as their future is being put up for grabs. **Z.1**

Until the DEIR on the Downtown Plan includes thorough analyses of
alternative growth management plans and answers the specific housing-related
concerns raised above, it cannot be considered complete, accurate and up to **S.1.1**
date. **S.2**

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Cow Hollow Association
Diamond Heights Community Association
Duboce Triangle Neighborhood Association
East and West of Castro Street Improvement Club, Inc.
East Mission Improvement Association
Eureka Valley Promotion Association
Eureka Valley Trails and Art Network
Friends of Noe Valley
Glen Park Association
Golden Gate Heights Neighborhood Association
Golden Gate Valley Neighborhood Association
Greater Westportal Neighborhood Association
Haight Ashbury Improvement Association
Haight Ashbury Neighborhood Council
Inner Sunset Action Committee
Jordan Park Improvement Association
Lakeshore Acres Improvement Club, Inc.
La Raza en Accion Local
Mission Creek Harbor Association, Inc.
Nob Hill Neighbors
Pacific Heights Neighborhood Council
Pacific Heights Residents Association
Parkmerced Residents Organization
Planning Association for the Richmond
Potrero Boosters and Merchants Association
Potrero Hill League of Active Neighbors
Russian Hill Improvement Association
Russian Hill Neighbors
Sacramento Street Neighborhood Improvement Association
South of Market Alliance
Stanyan-Fulton Street Neighborhood Association
Sunset Neighbors United
Sunset-Parkside Education and Action Committee
Temescal Terrace Association
Tenderloin Neighborhood Association

THE DOWNTOWN PLAN DRAFT ENVIRONMENTAL IMPACT REPORT

Preservation of Architectural/Historic Resources and the Transfer of Development Rights

The draft EIR's treatment of architectural/historical resources is superficial and the analysis of the transfer of development rights proposal is not at all developed. **H.1**

1. In particular, no economic analysis is presented which would indicate what the trade-offs may be between preservation and development for a given site, resulting from the constraints or incentives contained in the plan and/or alternatives. For example, it would appear to be possible to construct a model to determine the break-even point between demolition and development, given (i) the density of the existing building, (ii) the permitted density, and (iii) the demand. Without such a model, it is impossible to determine whether any given incentive would be effective. **C.1**

2. The treatment by the draft EIR of transfer of development rights (TDR) as a mitigation measure is wholly conjectural and is not rooted in the kind of economic analysis described above. Absent such an analysis, it is impossible to determine whether the measure would be very effective or would have no effect at all. **C.1**

a) On page V.H.1., it is stated that "Reductions in height and basic FAR limits from those provided in the existing Planning Code would reduce economic incentives to demolish older buildings and would help create a market for the transfer of development rights from such buildings". This result might be forthcoming, but not necessary. If permitted denisty is still substantially in excess of the density of an older building and demand remains high, there would still be an economic incentive to demolish the building. Further, if the volume of TDRs greatly exceeds the demand for them, the TDRs may have so little value that their sale would provide little incentive for preservation. The EIR must explore these questions with some valid economic modelling. **C.1**

b) The draft EIR analyzes TDRs only from the perspective of the site from which they are transferred and not from the perspective of the receiving site. Since TDRs permit increased density on the receiving site, it is probable that development on such a site would have a negative impact. Concentration of receiving sites could create a substantially adverse impact in a neighborhood. Since the TDRs would probably not be used in the vicinity of the sites on which they were generated, the adverse effects on immediate vicinity of the receiving site would not be offset by the beneficial effects of preservation of a low-density building nearby. **C.1**

3. With the foregoing analysis having been completed, the EIR should evaluate alternative forms of TDR, such as limiting the sites which could generate them, limiting the sites which could receive them, and limiting the distance over which they may be transferred. The aim should be to create a system which produces a real economic incentive to preserve significant structures while minimizing adverse environmental effect. It is unclear as to whether the proposed TDR system accomplishes these goals and the draft EIR contains no data which could lead one to decide this issue. **C.1**

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Alamo Square Neighborhood Association
Cow Hollow Association
Diamond Heights Community Association
Duboce Triangle Neighborhood Association
East and West of Castro Street Improvement Club, Inc.
East Mission Improvement Association
Eureka Valley Promotion Association
Eureka Valley Trails and Art Network
Friends of Noe Valley
Glen Park Association
Golden Gate Heights Neighborhood Association
Golden Gate Valley Neighborhood Association
Greater Westportal Neighborhood Association
Haight Ashbury Improvement Association
Haight Ashbury Neighborhood Council
Inner Sunset Action Committee
Jordan Park Improvement Association
Lakeshore Acres Improvement Club, Inc.
La Raza en Accion Local
Mission Creek Harbor Association, Inc.
Nob Hill Neighbors
Pacific Heights Neighborhood Council
Pacific Heights Residents Association
Parkmerced Residents Organization
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THE DOWNTOWN PLAN DRAFT ENVIRONMENTAL IMPACT REPORT TRANSPORTATION IMPLICATIONS

By CSFN Transportation Committee

The volume, nature, and timing of development in downtown San Francisco as proposed in the Downtown Plan will impose substantial demands upon the transportation system of the Bay Area. The extent of this growth and the manner in which the additional demand is handled will affect such diverse environmental factors as air quality, traffic congestion, crowding of transit vehicles, and the quality of life in residential neighborhoods. The impacts could be severely felt downtown and also severely felt in locales many miles from downtown. **D.3** **E.2** **E.3** **I** **Z.1**

We believe that the draft EIR fails to adequately assess the scope of the impact and to realistically assess the feasibility of mitigation measures. **S.2**

A. Impact.

1. General:

a) The transportation data is based, almost exclusively, on sampling done during 1981/1982 or even as early as 1977. Thus, the 1984 data presented are projections, not based on current sampling. At the same time there has been unprecedented growth within C-3 district since 1981. We are concerned that the 1984 data projections are not accurate, particularly in light of empirical observations which suggest that transit vehicles loads and freeway traffic conditions are worse than described. **E.1.3**

Is it not wise to test the methodology employed in making projections from the 1981/1982 base data by doing current sampling and comparing the results thereof against the 1984 projections? **E.1.2**

We suggest a small-scale random followup employee survey, similar to the one described at pages J11-2, to determine the accuracy of the 1984 transportation projections. We presently are in the position of making decisions based upon 1981/1982 data (on even data collected earlier). The problem is compounded by the tremendous growth within (and outside) the C-3 district since 1982. **E.1.2**

b) In estimating transportation impacts, non-C-3 growth is projected to increase at the same rate as C-3 growth (see J20-25). What rate of growth is projected? What are the bases for this assumption as to the rate of non-C-3 growth rate? Does the 1981 data afford a reasonable basis for projecting the increase in non-C-3 vehicle trips across the Bridges given recent growth in non-C-3 areas (see page J22). **E.1.5**

Does the EIR's assumption re non-C-3 growth adequately account for recent growth of commercial space in the areas north and west of C-3 and into the south of Market? What have been the annual growth figures and rates for these areas since 1975? **E.1.5**

Page J1 refers to "traffic volume counts" which included data collected previously by others. When did these data collections occur? Data collected prior to 1981 should be identified and it should be explained why that data is relevant to 1984 projections. The significance of this is its effect on the credibility of the transportation projections. **E.1.3**

c) Is it valid to ignore morning commute conditions where such conditions are worse than encountered during the evening commute? We request that specific morning transportation events be described, specifically, the Bridge approaches and the 101/280 interchange. (Re page IV. E12.) **E.1.3**

d) The top of page IV E20 refers to increase costs associated with peak period commuting. Other than greater time spent in the commute, what costs does the text refer to? **E.1.4**

e) There should be specific focus on City residents commuting from the west side of the City. These persons have the most crowded transit conditions of any Bay Area commuters. Drivers from the west side constitute over 40 percent of all vehicles entering the C-3 district. This area of the City should be targeted for specific short and mid-term mitigations. It may be a long time before a Geary Street Metro extension is constructed. What happens until then? Two-thirds of these residents are already taking transit so it would appear that improving transit service levels to the west side is one essential step. Commute conditions for these areas should be described in the event mitigation measures are not successful. **E.3.2**

f) The Peninsula provides the highest percentage of persons traveling by vehicle compared to transit. This suggests the necessity of a BART extension to the Airport with intermediate stations and an SP upgrade. San Mateo County must make the decision to buy into BART. **E.2.3**

2. Traffic Impacts:

a) Table IV E5 shows peak hour volume to capacity ratios (V/C) for a number of intersections within the C-3 district. Almost half of these are already at unsatisfactory levels. To what extent are the conditions described here and at pages IV E14-15 and 38 representative of other intersections? The Table also shows that almost all of these intersections will further deteriorate by the year 2000 if increases in transit capacity and ride sharing do not take place. **E.3.2**

Additional intersections should have been surveyed for the following reasons:

i) Intersections external to the C-3 district are affected by activity in that district in the same way that bridges and transit systems external to the C-3 district are affected. Indeed, the environmental effects of additional traffic in residential districts outside the C-3 district are greater, affecting not only the commuters and office workers, themselves, but also residents along the route who receive increased noise, air pollution, and congestion. **E.3.2**

ii) Only a few of the intersections surveyed are used by San Franciscans who drive or take transit to the C-3 district. **E.3.2**

iii) Intersections which now perform well may receive additional traffic diverted from the more congested intersections. For example, traffic from the Golden Gate Bridge may divert from Lombard Street to Bush or even Oak if conditions worsen. **E.3.2**

iv) Intersections which now perform well may receive additional traffic diverted from the better performing intersections. For example, traffic from the Golden Gate Bridge may divert from Lombard Street to Bush or even Oak if conditions worsen. **E.3.2**

v) Additional data should be provided in order to determine effects of increased congestion on transit scheduling and impacts on newly created residential neighborhoods. **E.2.2.3**
N.2

We believe additional intersections affecting San Francisco neighborhoods should also have been surveyed to better describe the extent of traffic flow on San Francisco streets. Significant intersections include, but are not limited to Market/Church, Market/Castro, Portola/St. Francis Circle, and various locations on Mission, Geary, Fell, Franklin and Lombard. **E.3.2**

b) Pages IV E5 and IV E15 project "minor" shifts from single occupant auto use to transit and ride sharing for 1984. We request that sampling be done to confirm if these shifts have occurred and in what corridors. We believe this is important because of the extent to which such shifts are key to the transportation projections that we will be able to accommodate projected growth. **E.1.2**

c) We differ with the characterization of the freeway loads. For example, the Central Skyway is frequently observed with "Level of Service F" conditions as early as 3:30 p.m. (Page IV E13.) What will conditions be like on the Central Skyway in 1990 and 2000? **E.3.1**

d) The peak period total number of vehicles to the Peninsula appears to be 7,420, not the 6,700 reported in the middle paragraph of page J22. **E.3.1**

3. Transit Impacts:

a) The difficulty we have with the transit impacts is the same that we have with the transit mitigation measures (see below): The draft EIR assumes that each transit agency's existing 1983-1988 five-year plan will be carried out and that certain selected projects beyond that period will be carried out. As more fully discussed below, MTC and most other commentators believe that it is unlikely that all of these projects can be funded with available resources. Thus, the impacts on the transit system shown in the draft EIR are probably unrealistically optimistic. The EIR should evaluate the impacts resulting from lower levels of transit improvements and expansion. In evaluating the probability that certain measures will be implemented financial constraints as well as political constraint, (e.g., regarding BART expansion into San Mateo County and the development of transit-preferential streets) should be taken into account. **E.2.1.1** **E.2.3**

b) Page IV E7 notes near-capacity peak-hour and peak-period loadings on some routes in 1981/1982. It is our understanding that for MUNI this data is aggregated and that certain routes are better or worse than others in terms of capacity loadings. We request data on the specific MUNI routes that are at or over capacity. Among these we believe are the Geary Street, the Sacramento Street, MUNI Metro and the Mission

Street lines. This data is essential, particularly in light of the admission on page IV E9 that overall ridership conditions are distorted by aggregating the date. For example, we believe that Muni Metro frequently operates at Level F, crush loading conditions. We believe that some of the bus lines, particularly the Geary, Sacramento, Stockton and Mission lines are similarly overburdened. **E.2.2** **E.2.2.3**

c) In gauging the future capacity of suburban systems, particularly BART, it is not clear that the projected increase of mileage of the system, as well as significant growth in Contra Costa County has been considered. The mileage expansion will increase time taken by each train to complete runs. Increased travel to suburban job locations will increase competition for space on BART trains. Have these factors been considered? If so, what does the pertinent data show? **E.2.3** **E.1.4.3**

4. Cumulative and Regional Impacts:

Curiously, the draft EIR appears to limit its discussion of impacts to the C-3 district and the people travelling to and from that district. It does not take into account the effect of downtown development on other parts of San Francisco or the remainder of the region. For example, BART may have sufficient capacity to carry East Bay commuters to and from their jobs in San Francisco, but would the system also be able to accommodate substantial employment growth in downtown Oakland, which is served by those same trains? To what extent would diversion of employment to the ends of the BART lines (e.g., Richmond, Fremont, Condord) result in more efficient use of the system by encouraging two-way usage during rush hours? (This may be discussed as a mitigation measure.) **E.1.4.3** **E.1.7** **E.2.3** **E.2.2.3** **E.2.4** **E.2.5** **E.2.6**

E.4 **E.3.2** **E.3.1** **E.2.7.4**

Similarly, cumulative impacts have not been discussed. Other development, such as the proposed Mission Bay project, and other non-C-3 development in San Francisco, together with development outside the City, such as in downtown Oakland, will affect the transportation system and should be expressly taken into account. **E.1.5** **E.1.9**

5. Financial Impacts:

The plan proposes transportation projects which will be very expensive and will likely not be paid for by the federal or state governments. To what extent will they be a financial burden on the residents of San Francisco and of the region? While an EIR does not expressly address financial considerations, this question has implications relating to affordability of residence, feasibility of the projects, and the desirability of San Francisco as a location for new office development. **E.2.7** **E.6**

B. Rail Transit Mitigation Measures.

1. The rail transit mitigation measures (Nos. 2 through 12) set forth a number of rail transit projects designed to alleviate existing insufficient capacity and to accommodate additional travel resulting from the growth projected by the proposed Downtown Plan. Some of these projects are said be "essential" to accommodate projected growth (e.g., the Embarcadero turnaround), some are said to be "not essential", but would "substantially improve service" (e.g., the MUNI Metro Geary/3rd Street line) and for other measures no indication is made as to whether they are essential. **E.6**

2. The timing of these mitigation measures is not expressed except in generalities and for some no time is given. It does not appear that any project will be in operation prior to 1987 or 1988 and most will not materialize, if at all, until well into the 1990s. There is no indication that the timing of the mitigation measures is at all related to the timing of the overcrowding of existing services. Rather, it would appear that the timing of mitigation measures is taken solely from plans or hopes of operating agencies. **E.6** **P.2.1**

3. The description of the mitigation measures does not imply that any of them can or will be carried out. In some cases (such as with the BART extension to SFO with intermediate stations or Geary Street Muni Metro service) there are political constraints which might preclude implementation of the measure. In most cases, however, financial constraints will be most prominent. Measures 4 through 12 are new starts or expansions of existing services and are described in the MTC San Francisco Bay Area New Rail Transit Starts and Extensions Staff Recommendations (December 1, 1983). According to MTC's figures, the cost of construction for these mitigation measures would amount to as much as $2,352,000,000. Even if the Geary/3rd Street LRV line (which the EIR says is "not essential" to mitigate impacts) is removed, the total is $1,552,000,000. While this amount seems formidable, it should be noted that San Francisco's needs must compete with needs for other parts of the region. MTC estimates that the total amount of new construction for projects which it has identified could be as much as $6,566,000,000 through 2000. The region, in turn, must compete with other projects throughout the state (up to $8,200,000,000 through 1993) and throughout the country. MTC says, with respect to this issue:

> Funding the $1.2 to $1.5 billion Stage I [1983-1993] program will be a formidable challenge in itself. Funding the entire $5 to $7 billion program proposed by the operators would be virtually impossible at this time.

E.6

The foregoing figures do not include such programs as the proposed north-south "shallow subways" described in Measure No. 20, or the Van Ness subway described in Measure No. 46, for which no costs have been estimated and which are not part of MTC's plan. Thus, the mitigation measures proposed fail in two respects: (1) they fail to identify the probable timing of the measures and their mitigation of adverse impacts and (2) they fail to realistically assess the prospects that these measures can actually be implemented. **E.6**

C. Non-Rail Transit.

1. Mitigation Measure No. 13 is also defective for the reasons described above (relating to timing and probability of funding). First, it projects capacity increases of 15 percent by 1990 and 24 percent by 2000. However, it fails to indicate how those increases will be allocated to relieve overcrowding and the timing of that allocation. In addition, there is no indication as to whether the vehicle acquisition program described has already been funded or whether reasonably available funds have been identified. **E.6**

2. The issue is not addressed in this section as to how the increases in numbers of vehicle-seats will translate into added capacity. It has been recognized elsewhere in the report that downtown and congestion may largely offset the effects of increases in transit capacity, notwithstanding the mitigation measures. Therefore, it may be assumed that a 15-percent increase in vehicle seats will result in a somewhat smaller increase in actual capacity by 1990. **E.2.2.3**

3. The EIR should discuss as mitigation measures more types of alternative transit service, especially to areas which are now poorly served and which are difficult to serve by conventional means. For example, the BART shuttle to Miraloma Park has proved popular and its expansion to other neighborhoods should be considered. Expansion of jitney service, especially with flexible routes through lower density arears, should be considered. **E.6** **E.6.2.2**

D. Automobile Mitigation Measures.

1. The draft EIR proposes, as a mitigation measure, limiting automobile commuting by limiting the number of parking spaces and by maintaining or reducing existing automobile capacities of the bridges, highways and freeways entering the City. This concept is admirable, but could be expanded. Many City streets serve as conduits for an excessive amount of commute traffic, both from within and outside of the City. In some areas (e.g., Oak and Fell Streets, Pine and Bush Streets), towaway zones have been established n residential neighborhoods in order

to increase the capacity of the streest during peak periods. These zones remove scarce parking spaces in those residential neighborhoods while encouraging commuters to drive downtown. Removal of these towaway zones would restrict automobile access to the downtown (resulting in switch to other modes) and would expand the number of parking in the neighborhoods. **E.6.3**

2. One mitigation measure which should be discussed is that of increasing parking taxes (especially for long-term parking) If the number of parking spaces is limited (as proposed by the Plan) and the demand for those spaces increases (as assuredly it will with increased development), the law of supply and demand will cause the price of those spaces to increase. Absent public policy to the contrary, this increase in price will represent an unearned windfall to the parking lot owners. It would be wise to structure a parking tax which would be at least equal to the amount of price increase which market forces would otherwise dictate. If it is desired to further discourage automobile commutation, a tax in excess of that increment may be called for. The proceeds of this tax could be used to finance transit improvements called for in the Plan for which funding is otherwise unavailable. **E.6.4**

E. Scheduled Mitigation.

Our principal proposal is that the draft EIR be revised to propose and the Downtown Plan be amended to include the concept of scheduled mitigation. In other words, the volume of growth under the Downtown Plan would be scheduled. Likewise, housing and transportation mitigation measures adequate to fully mitigate the adverse impact of that growth would be scheduled over the 16-year period covered by the Plan. If the scheduled mitigation measures are accomplished, growth could occur as projected by the Plan. If they are not accomplished, growth would be automatically limited to the extent necessary to avoid the adverse impact. All of the schedules would be reviewed annually to determine that they are still accurate, feasible, and reflect current policies. **E.6.1** **P.2**

South of Market Alliance

JUN 4 1984

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Fil-Am Senior Citizens Society of S.F.
West Bay Filipino Multi-Service Corp.
Canon Kip Community House
T.O.D.C.O.
South of Market Grocery
D. Art
CEBU Assoc. of Calif.
Citizens for Representative Government
Consumer Action
South of Market Community Development Corporation

Organizations for identification purposes only

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June 4, 1984

Please find enclosed comments from the South of Market Alliance on the Draft EIR for the "Downtown Plan" (EE 81.3). **Z.1**

The main comments are the section titled "The Downtown Plan Vs. The South of Market". There are two additional documents included as exhibits, and portions of the Yerba Buena Center Second Supplement to the Final EIR are incorporated into the comments by reference. **Z.1**

I must advise you that any attempts to sidestep the major issues raised in these comments by sweeping assertions such matters are 'outside the scope' of the Downtown Plan or its EIR will inevitably result in litigation of the document, with the attendant several-years delay in the implementation of the Downtown Plan. If you are serious about enacting your proposal, you will take the time to address all the issues. **B.1** **B.2** **B.4** **D.5** **Z.1**

Sincerely,

John Elberling

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Special Section JUN 4 1984

THE DOWNTOWN PLAN VS. THE SOUTH OF MARKET

Despite official statements to the contrary, the Department of City Planning's much-ballyhooed "Downtown Plan" offers little protection to the South of Market's existing residents, workers, and small businesses. A.4

Admittedly, the western South of Market area which contains the greatest concentration of these vital community resources is the subject of a separate study process. The "South of Market Industrial and Housing Conservation Special Use District" was established in November of 1983 at the behest of the City's Board of Supervisors (not the Planning Department), and a follow-up zoning study by the Department of City Planning was funded via a supplemental appropriation of $335,000 approved by the Board in April of 1984. This study is intended to be completed, with recommended zoning and Planning Code changes, before May of 1985 when the development "moratorium" which accompanied the establishment of the Special Use District is scheduled to expire. The scope of this study, its objectives, and its community participation program were all refined by the Planning Department following discussions with civic groups, including the South of Market Alliance, so that this study process now has wide support. A.4

But none of this has been incorporated within the Downtown Plan itself - and it is that legislation which will be acted upon now, in 1984. A.4

This lack of planning coordination is more than just a abstract problem. That is because the proposals in the Downtown Plan for the South of Market, if adopted, will have destructive impacts on this neighborhood which cannot be fully reversed even by very different legislation one year later (if adopted - which is never certain, and therefor not part of the legally identified content of the Downtown Plan for CEQA purposes). A.4 S.1.1 Y.1

For this reason, it is vital to revise the proposed Downtown Plan legislation affecting the South of Market that will be considered for adoption in 1984. A.4 Y.1

For the sake of legal adequacy within the Downtown Plan Environmental Impact Report Process, this Special Section will be divided into the EIR categories of: (B) Land Use and Real Estate Development; (D) Residence Patterns and Housing; and, (F) Community Services. A.4 S.1.1

The revisions to the Downtown Plan proposed as part of this South of Market Neighborhood Plan are fully stated within those Sections, and are hereby formally proposed as a group for an alternative that must be fully evaluated as such within the Downtown Plan Environmental Impact Report. A.4 Y.1

SOUTH OF MKT ALLIANCE
JOHN ELBERLING

(B) Land Use and Real Estate Development

It is fair to say that the South of Market is the focal point of future development in San Francisco under the Downtown Plan. With thesingle exception of the Van Ness Corridor area (most of which is not included within the Downtown Plan), all North of Market districts - including the historic Financial District, the Union Square area, and the Tenderloin - are proposed for a general 'downzoning' of one type or another by the Downtown Plan. A.4 Z.1

As stated in the Downtown Plan Draft Environmental Report (the "DPDEIR", or just "DEIR"), "The Plan seeks to redirect major office growth south of Market Street, primarily into the southerly portions of Subarea 1 and Subarea 2". These two "planning areas" comprise the northeastern quarter of the South of Market - from Yerba Buena Center to the Bay, from Market Street south to Folsom Street. B.4.1

Because Subarea 1 also includes the historic Financial District north of Market Street, the DEIR fails to identify how much new office development is projected for this part of the South of Market alone (this needs to be made clear), but between 1984 and the year 2000 based on the DEIR's projections it will be something more than 10,000,000 square feet of office space - the equivilent of about 20 Transamerica Pyramids. There will be new tourist hotels and retail complexes as well. B.4.1

On the other hand, to the west of Yerba Buena Center where the South of Market's remaining affordable housing is now concentrated along with many small businesses and many vacant lots, the Downtown Plan projects much less - but still significant - amounts of office growth. Because, again, the DEIR's "study areas" 4 and 5 include both North and South of Market areas while only Subarea 3 (the present C-3-S zone west of YBC and south of Mission Street) is confined to the South of Market, the DEIR fails also to identify how much new office development is projected for this northwestern quarter of the South of Market (this also needs to be made clear). But based on the DEIR's projections, the total amount of new office development here between 1984 and 2000 will approach 1,000,000 square feet. This would be divided among 10 or more smaller new office projects. B.4.1

But wait - as the say in the Ginsu television advertisements - there's more! Much more! Z.1

As noted by many commentors, the Downtown Plan and its DEIR are greviously inadequate in their failure to estimate the new cummulative development that will occur as well by the year 2000 outside the limited boundaries of the C-3 zoning district. It is these total numbers, of course, that provide the only accurate basis for the evaluation of transit, traffic, land use, housing, air quality, etc., etc. impacts. Most of the ommissions lie within the South of Market, as follows: B.2.1
B.2.2

1. Yerba Buena Center

Actually the YBC Redevlopment Area is included in the C-3 District development projections in the DEIR. But it is important not to miss the major issues YBC raises within the Downtown Plan - vitually none of which are addressed in the DEIR (all the following require EIR disclosure and evaluation): **B.2.1**

- The official YBC project area is designated as its own special zoning district in the Downtown Plan - "C-3-YBC". Under the Downtown Plan, this entire area will be toally exempted from all the Plan's new zoning and design rules - and mitigations - until the year 2006. **Z.1**

  Instead, the existing provisions of the official Redevelopment Plan will remain the zoning rules until then. It is important to realize that the provisions of that Redevelopment Plan, most recently revised in 1981, with regard to development density, height limits, design rules, etc. were based on the general City zoning rules then in effect. Thus the Downtown Plan proposes to 'freeze into time' - the next century! - zoning standards which itself admits now need major overhaul in the rest of Downtown. **A.1** **Z.1**

- Even more important, since the adoption of that Redevelopment Plan the City has adopted the two most significant mitigtion measures regarding new office development: the Transit Development Fee, and the Office /Housing Production Program ("OHPP"). Neither of these two most significant mitigation measures now apply to any new office project in Yerba Buena Center, and under the Downtown Plan, they never will. **D.5.1** **E.2.7.2**

  What will be the effects? Between 1984 and 1990 there will be a series of new office projects filling out YBC: first, the office tower(s) of Olympia & York's "Yerba Buena Gardens", totalling more than 1,250,000 square feet, second, a 400,000+ square foot office tower at Third and Mission Streets, and later several smaller office projects south of Howard Street totalling another 400,000 square feet or less. **B.2.1**

- With regard to transit/transportation impacts, there is little effective mitigation proposed. Such measures are discussed in the Final Second Supplement to the YBC EIR. There is no provision for Transit Fee payments by any of these projects - doubly ironic in view of the tremendous new parking facilities proposed for YBC, including a new 2000 car underground garage underneath the "Gardens" project. **E.2.7.2**

- With regard to impacts on the City's affordable housing generated by this new office development, there are better prospects. While the Third and Mission office development may unnecessarily demolish the one remaining residentia hotel in YBC, the Jessie Hotel with more than 100 units (a structure also determined eligible for listing on the National Registry of Historic Places, and thereby a potentially impacted historic/architectural resource of the type the Downtown Plan seeks to protect), the Redevelopment Agency has pledged to carry out one of the major housing impact mitigtion measures identified in the project EIR Supplement, the establishment of a housing fund, within the overall financing arrangements for YBC, that will be utilized to conserve the existing supply of affordable housing, both resdential hotels and family apartments, located in the western South of Market. This new fund will total $5,000,000 of 'gap financing' assistance, potentially leveraging $25-35,000,000 of additional housing investment, all directed at maintaining existing affordable housing. **D.5.3**

The South of Market's Alliance's proposal for the use of this housing mitigation fund is described in full in another special section of this Neighborhood Plan, "The YBC/South of Market Housing Fund". This proposal is hereby formally proposed as a mitigation measure for YBC office development impacts only to be incorporated in the Downtown Plan DEIR "Mitigation" section. **D.5.3**

- There are additional mitigtion measures that have been
proosed as well as part of the YBC project for Community
Service impacts. These will be reviewed in section F of **Z.1**
this Special Section.

Historically, the Yerba Buena Center Redevelopment Project
was the initial thrust of massive downtown development into the
South of Market, part of a recurring theme in San Francisco
official development planning since 1960 when, significantly,
Joseph Alioto became President of the Redevelopment Agency and M.
Justin Herman its Director during the administration of George
Christopher. The price of this civic policy, in both dollars and
human costs, has been high during the intervening quarter century **Z.1**
- and it has not yet been paid in full.

The Downtown Plan attempts to use Yerba Buena as the
'dividing line' between massive new development to the east and a
more protected area to the west. But as will be set forth in this **A.4**
report, the actual measures it proposes are inadequate for this **Z.1**
self-assigned task.

2. Rincon Point/South Beach Redevelopment Area

About one-half of this second major South of Market Redevelopment Agency Project is included in the Downtown Plan and its DEIR, about one-half is not. **B.2.3**

This anomaly results from the C-3 District limitation artifically applied to the Plan and DEIR by the City Planning Department. The Redevelopment Area was approved by the City in 1981, the result of a five-year waterfront planning process which did include a great deal of community participation. he northern portion (Rincon Point), lying within the C-3 District, will be principally commerical development and its new office development and hotel have been incorporated in the DEIR projections. Since it is not specifically exempted from the Downtown Plan's new zoning and design rules, apparantly that new development will be subject to those regulations in addition to the requirements of the adopted Redevelopment Plan for this area (this needs to be confirmed). In the main, this will affect only the planned new warterfront hotel. One major new mixed-use project, including some residential development, is planned for the Rincon Annex site (preserving the Post Office structure).

B.1.4
B.2.2
B.2.3

The southern portion of the Redevelopment Area (South Beach) is planned principally as a new residential community of 2,000+ units of new housing, with a goal of 50% to be developed as affordable housing. There will be a significant amount of office space in the area, though, 250,000 square feet or more.

Z.1

As with YBC, the office space proposed in this Redevelopment Area is not subject to mitigation requirements under the City's Transit Impact Fee or OHPP program. While the office developers here are also building housing which may meet or exceed the requirements of the OHPP as it has existed until legislative adoption, it is very ironic that there is no significant transit/transportation impact mitigation required of developers, although the City intends to expand the MUNI LRV Maret Street subway system right past their front doors along the Embarcadero south to the Southern Pacific rail terminal, one of the Downtown Plan's specific proposed transit mitgation measures.

D.5.1
E.2.7.2

The Downtown Plan DEIR does take note of this new RP/SB Redevelomont Area housing as a new supply resource working to offset or meet the new housing demand that will be generated by the continued massive office development its proposes to "accomodate" - but it 'forgets' to count and subtract from that beneficial effect the impact of the new office space outside the C-3 District but within the Redevelopment Area that goes with it. This is a subtle form of 'double counting', and inherently misleading.

D.2.5

3. Rincon Hill Interim Control Area

Not to be outdone by the Redevelopment Agency, the Department of City Planning has embarked on its own effort to foster visionary city development.

B.2.1
B.2.2
N.2
Z.1

This eastern South of Market area, placed under temporary development limits by the City Planning Commission in 1983, is focused on Rincon Hill, immediately north of the Bay Bridge,

reaching down to the Embarcadero. In essence it covers the area
lying between the two separated halves of the Rincon Point/South B.2.3
Beach Redevelopment Project. It's potential was noted also during N.2
the waterfront planning process that led to RP/SB.

The Planning Department has had under preparation since 1982
a design/zoning concept which intends to reate a major new
residential complex here with some associated "buffering"
commerical development. The concept provides for up to 7,500 new
housing units, and about 1,000,000 square feet of commerical
development, mostly new or converted office space, although this B.2.2
amount will grow with the newly planned development of the Hills N.2
Bros. complex. B.2.3 Z.1

There are two outstanding features of this project. One is
the intended big increaes in building height limits on the crest
of Rincon Hill, right next to the landing point of the Bay
Bridge, to permit construction of 30 and 40 story luxury
condominium towers. The other is the toal lack, to date, of any B.2.2
commitment to any production of affordable housing in this B.2.3
massive new complex. H.4 N.2

How this might change is unknown. The Planning Department
has carefully kept the project 'under wraps' since its 1982
conceptual presentation. The Draft Environmental Impact Report
for the Plan, evaluating the new zoning which is intended to B.2.2
guide this development, has been 'almost' ready for draft B.2.3 H.4
publication since late 1983 - but has yet to be released. N.2 Z.1

This is a serious problem for accurate and complete review
of the Downtown Plan and its DEIR. There is of course the
1,000,000 square feet or more of office development whose
housing, transit, transportation, etc., etc. impacts are not E.1.5
being included in the DPDEIR's analysis (although, again, the new
housing is cited as a resource to meet the Downtown Plan's
housing impacts, despie the obvious limited utility of
exclusively market-rate housing in this regard). But what is
outstanding here will be the cumulative visual impacts on the
City's skyline. Expansion of office development into the South of
Market at a minimum 200 foot tall level to the base of Rincon
Hill, with then an outcrop of 300-400 foot condominum highrises
on top of the hill itself will extend the skyline - the "downtown
hill" called for in the City's much-hearalded "Urban Design Plan"
of 1973 - into, say, a "downtown mesa" stretching almost a full
mile along the waterfront, capped with a new cluster of high- B.2.2
rises at its southern end. B.2.3 D.2.5

Esthetic considerations are not the principal concern of H.4.3
many, including the South of Market Alliance, but in this one
case of the City's world-famous image from San Francisco Bay, one
cannot fail to note that the Downtown Plan DEIR, by failing to
incorporate the existing but suppressed Rincon Hill project ADEIR
(administrative draft - technically a public document), is
knowingly failing to provide complete and adequate information
about the cumulative impact of the Downtown Plan in conjunction

with another resonably foreseeable proposed project with regard to one of San Francisco's most vital civic assets - which has already be damaged by recent downtown development: its image, its skyline, its beauty.

B.1.1
B.2.2
B.2.3
H.4.3

4. "Hill Bros. Site"

This large one block developmet is now titled "Hills Plaza", and is proposed to contain 587,000 square feet of office space, 85 housing units, retail, and 410 parking spaces at a key waterfont site. One high-rise tower will be 200 feet high, part of the "mesa" noted above. **B.2.3**

A full description of the project is set forth in the Initial Study (84.41E) dated 6/1/84, which is hereby incorporated in these comments by this refernce. All relevant material therein must be incorporated in the DPDEIR analyses of cumulative impacts.

B.1.1
B.1.2
B.2.2
B.2.3

5. Showplace Square

Technically this is not one project but a coordinated concept of several commercial complexes focused on a variety of wholesale showroom developments, both existing and proposed. **Z.1**

As presented in 1983 by the Showplace Square Association, the overall concept would include additional showroom development, one or more new hotels, and expanded parking facilities. **Z.1**

The amount of development to date and pending approval by the Planning Department must be included in the DPDEIR's cumulative impact analyses. At a minimum, the balance proposed must be incorporated with regard to its prospective general impacts as described elsewhere in these comments.

B.2.1
B.2.3

6. The "M" Zones

The entire southern half of the South of Market is zoned M-1 (light industrial, warehousing, and service businesses in theory). This district stretches from the North Mission/Showplace Square area in the west to the Embarcadero, from Folom Street south to Townsend Street and the China Basin/Mission Creek Channel. **Z.1**

Despite the general concept of "M" zoning, and the underlying 1959 City Master Plan Land Use Map which is still legally in effect, times have been changing, and the mixture of land uses and businesses in this part of the South of Market have reflected the overall evolution of the City's eoncomy.

B.2.3
Z.1

But a great deal of affordable housing still remains scattered throughout the northwestern quarter of this M-1 District, as well as quasi-industrial businesses. If large scale warehousing and printing have moved in general to suburban locations, many specialized wholesale supply houses have stayed to keep close to their clientel. And even as machine shops relocate from this area, new graphic and specialized commercial crafts workshops move in. The diversity of this area is much more fully described in the main body of this Neighorhood Plan. B.2.2 B.2.3

With regard to the Downtown Plan and its DEIR, however, the key consideration is the large amount of new office development which the Planning Commission has permitted to be developed in this M-1 District in recent years. Due to a loophole in the Planning Code, office space is a "permitted use" for this intended industrial zoning category, meant originally to accomdate the small offices connected to industrial businesses. B.2.2 B.2.3

Since 1978, more than 3,000,000 square feet of office space has poued through this loophole, most contained within former warehouses converted to office space. The greatest focus of that type of development has been along the Second Street corridor (which lies outside of the study area just established for future protective rezoning). New office buildings have been proposed and approved as well, generally near Yerba Buena Center or Showplace Square. B.2.2 B.2.3

The yet greater cumulative amount of M-1 District office development, including what has been actually built, what has been approved, and what is currently proposed, is of very great consequence for its impacts on housing, transit, transportation, etc., etc. in combination with the office development proposed by the Downtown Plan and other areas. The Downtown Plan DEIR with egregious inadequacy fails to incorporate any of this information in its evaluations. B.1.1 B.1.2 B.2.1 B.2.2 B.2.3

In addition, this M-1 District office development has significant impacts on land values both within and adjacent to it which will be reviewed below. The DPDEIR also fails to take this material effect into account in evaluating the probable results of its own proposals for western South of Market C-3 District rezoning. B.2.3 B.4.1 N.1

6. The Downtown Stadium

It is a legal argument whether or not the proposed new Downtown Stadium has sufficient likelihood of actually being built to warrant cummulative impact evaluation within the Downtown Plan DEIR. B.2.2 B.2.3 N.2

But, it is not a planing argument as far as the Planning Department and Commission are concerned. The new Downtown Stadium is a top priority civic action proposal by the Mayor of San Francisco, who has constituted a task force which includes the

Director of City Planning with the responsibility not to determine if it is a good idea but to figure out how to do it.

B.2.2
B.2.3
N.2.

The arguments for and against this project aside, the basic point for these comments is that in planning for the future of the South of Market through, in part, the Downtown Plan process the consequences of a new Downtown Stadium must be taken into account.

B.2.2
B.2.3
N.2

There obviously would be significant impacts from a new Downtown Stadium on the City's traffic and transit systems which could produce severe problems in conjunction with new downtown development, both that proposed by the Downtown Plan and that outside the focus of the Plan. Depending on what location is specifically chosen for the Stadium, there could also be important impacts on nearby land values and uses in the South of Market.

B.2.2
B.2.3
N.1
N.2

7. Mission Bay

Given recent political developments regarding Mission Bay, the Planning Department's position that a project which to any significant extent approaches the large scale "mixed use" concept proposed in 1983 by the Southern Pacific Development Co. cannot now be consdered reasonably probable seems justified. The uncertainty which now surrounds the future of this huge tract which forms the southern boarder of the South of Market effectively precludes its incorporation into the Downtown Plan DEIR's cumulative analyses.

B.2.2
E.19

But ... The strip of Southern Pacific's property along the north side of the China Basin/Mission Creek Channel may not be included in the proposed residential rezoning of the larger area to the south. This very large four-block area has always been envisioned by SP as the site of the most new commercial office development in the entire Mission Bay concept.

B.2.1

This significant sub-area may portend serious land value inflation/speculation impacts for the South of Market areas immediately adjacent, and this also will be discussed below.

B.2.1
B.2.2
N.1

Permitted Densities, Land Values, Speculation, and Displacement

The discussion above regarding all the foreseeable development which will surround the western South of Market area like a noose sets the necessary context to evaluate the impacts of the Downtown Plan itself on this core neighborhood.

The Downtown Plan DEIR is seriously deficient in failing to describe the chain of impacts of zoning regulations, overall planning concepts, property owner expectations, land/building

Z.1

speculation, property income dynamics, and resulting market conditions for both residential and commercial properties that has inthe past and forseeably will in the future result in large scale displacement of low income residents of the South of Market, as well as many otherwise viable small businesses and service enterprises. **B.4**

In brief:

1. New buyers of property may determine the price they will pay by one of two general means:

- based on the profit, however defined, they can secure from the property based on its present use, rent levels, etc., in which case the property is being bought as an "income investment"; or,

- based on a change in the use or type of tenants for the property which would permit significantly greater profit than the current use. Obviously in this case the buyer will be prepared to pay more than one who intends to maintain the present useage. **B.4**

2. It is fair to say that if the buyer intends to construct a new building in the near future, or to convert an existing structure to a different use, that the property is being purchased "for development". Such a buyer will pay, usually, the highest price for the property, and by definition whatever business or residents occupy that property now will be displaced. **B.4**

3. It is also fair to say that if the buyer instead intends to maintain the property in its current use for some period of time, but to develop it at some planned point in the future, that the property is being purchased "for investment". In this case, existing businesses or residents can remain for some time. But there is no incentive for the new owner to make major expenditurs for property rehabilitation and maintenance beyond immediate needs, and commercial leases would be short-term, making it unwise for businesses to make any significant investment in their facilities either, but rather to seek other longer-term alternative locations. Such a buyer would not pay as much for the property as one purchasing for early development, but still would pay more than "income investment" could support. **B.4**

4. It is unfortunately fair to say that if the buyer intends to neither develop the property themselves at any definite time in the future, nor to depend on the existing use as an "income investment", but rather to resell the property at a profit or 'wait and see what happens' in the expectation of significant appreciation in the property's value, that the property is being purchase "for speculation". Again, in this case existing businesses or residents can remain - but it is only in the interests of the new owner to do so as long as their rents exceed the property's operation/maintenance costs, and as above there is no incentive at all for the owner to invest in any major **B.4**

rehabilitation of the property. Since the ultimate use of the property is unknowable, there is great uncertainty for any commercial tenant, no long term lease, and hence disincentive for new investment on their part. Such a speculative buyer will be willing to pay a price based on his or her business judgement, or expectation, as to how much they will be able to resell the property for at some point in he reasonably near future, usually five years or less. Some such buyers are willing to take a greater risk than those with other objectives, since their potential losses are limited in accord with the shorter duration of their ownership. In the event that the original business judgement or expectation proves incorrect, such buyers may encounter substantial financial losses and be unable - or unwilling - to expend any funds at all for property maintenace or upkeep. **B.4**

As a demonstrable fact, all four of these types of property acquisitions are now, and have been, ongoing in the South of Market in great number. Two very significant reasons for this are:

- That the western South of Market has the lowest land /building values remaining in the downtown area; and,

- That there are literally hundreds of small lots and buildings in the area. **B.4**

The combined result of these two factors is that this area alone in the downtown area offers the opportunity for relatively "small investors" to purchase property, and in fact has become a sort of 'entry level' zone for those seeking their first major investment in downtown real estate. A corollary result is that many of those making such investments are somewhat inexperienced, and not 'highly capitalized'. Such buyers are necessarily 'speculative', lacking resources for new development or the 'staying power' for longer-term investment. **B.4**

It is important to analyze the different kinds of South of Market properties and how these buyer dynamics relate to each. **B.4**

Vacant Land

There are many vacant lots in the western South of Market, including both the C3-S District and the CM and M zones. Some are small lots of as little a 1250 square feet, others are more than one acre. Most, though not all, are in present use as fee parking lots. **B.4**

The value of these lots obviously is not set by the net parking lot income/rental, but rather by their potential for future development. Since they are vacant there are no direct displacement impacts of such development. **B.4**

Small Commercial Buildings

There are hundreds of such structures on smaller lots. Commercial tenants are diverse, drawn by both fairly low rents as well as proximity to the downtown. These firms typically cannot afford rents comparable to what specialized professional firms can afford. Many of these firms are newly started, and many are minority-owned; many employee predominantly City residents, and there is a wide diveristy of skill types, including unskilled labor, within this employment base. **B.4.1**

The value of these properties, like parking lots, is not set by the existing rental income but by the potential for future development. Thus the business tenants are very vulnerable to displacement, and may be unable to afford to buy the building in order to remain. Few small businesses here already own their premises. **B.4.1**

Large Commercial Buildings

There are dozens of such substantial stuctures, mostly present or former warehouses. These buildings typically are well suited for conversion to commerical office space, allowing for various engineering requirements, and those near the Showplace Square area can also be adatped to specialized wholesale trade showroom use. **B.4.1**

In either case, the purchase value of these properties reflects this potential for office conversion. Probably more than half of these properties have already been acquired on that basis. In other areas such properties have been divided into small commercial rental complexes, providing more flexible space to smaller businesses like those desribed immediately above, but this alternate use cannot compete in the purchase price it can support with office conversion. **B.4.1**

There are also a number of formerly heavy industrial buildings remaining in the South of Market. Such properties are in essence valued as vacant land since they cannot readily accomodate efficient office conversion. One such property, the former Hamm's Brewery, is now being converted to commerical use, but only with the assistance of a federal "UDAG" grant. Otherwise in all likelihood it would have been demolished in the future. **B.4.1**

Family Apartments

There are hundreds of such properties, few exceeding 10 units, sited on the alleyways which crisscross the western South of Market. Rent levels are low in most cases. Due to the location, small lot sizes, and low rents, the purchase price of these properties has been set generally on their value as income properties, remaining rental. However, this price can still reflect potential for notably higher residential rents due to the area's potential for "gentrification", i.e., the replacement of the prevalent minority households with children by multi-earner, adult professional households able to pay significantly more rent. B.4.2

Buyers of these properties typically do anticipate the cost of moderate rehabilitation and regular maintenance, somewhat moderating the market value. B.4.2

Of course there is a limited number of family apartments which are adjacent to a significant parcel of developable land, and in that case their value may be increased by potential incorporation into that project. The result of such a project would be limited but definite displacement of those households. B.4.2

Residential Hotels

Most of these larger properties are located on the major streets of the South of Market. As noted elsewhere in this report (see "The YBC/SOM Housing Fund"), this is a highly vulnerable component of the South of Market community's affordable housing supply. B.4.2

In summary, well located residential hotels are subject to conversion to tourist serving use. Their purchase value is definitely set by that potential, the Hotel Conversion Ordinance notwithstanding, and that price is quite high (more than $20,000 per unit). B.4.2

Poorly located hotels, e.g., those n Sixth St., are valued based on the maximum net operating income stream which can be wrung out by, typically, master lease holders/operators. While room rents for such properties seem low ($250 per month or less), the small room size, coupled with ruthless minimizing of maintenance and operating costs by slumlords results in a surprisingly high value ($15,000 per unit or more). B.4.2

Many residential hotels are potentially convertible to office use, or comparable professional 'studios', depending on various details of the Hotel Conversion Ordinance, and the general 'upgrading' of marginal locations. One recent example is the office conversion of the former Planters Hotel in Yerba Buena Center. B.4.2

Obviously such tourist or office conversions translate at some early point into displacement of the low-income hotel residents. Typically this is accomplished before the property is sold in order to increase its market value, and the standard means to accomplish that is chronic lack of maintenance which leads to sudden and forced eviction/closure by the Department of Public Health due to unsanitary or unsafe conditions. This sequence in fact occured in recent years at several hotels in the South of Market's South Park district, which is very close to the active office conversion market focused on Second Street. B.4.2

Some hotels are located so that there is no early potential for succesful conversion, especially those on or adjacent to Sixth St. In this limited case buildings that require major maintenance exependitures to remain in operation - typically those undergoing city condemnation proceedings - may be closed completely due to the inability of the owner to finance or pay this large one-time cost. There are a number of such boarded-up residential hotels in this area. In this circumstance investment-oriented purchase is possible only if the price is unusally low and/or special rehabilitation funding is available such as City low-interst loans. However the land underneath these structures does have significant potential long term appreciation value if future commerical development and 'upgrading' of nearby areas can be anticipated. Thus City programs designed to maintain low-income housing can possibly permit a sophisticated form of long-term speculation, especially if the buyer's risk of operating losses is further reduced by a guaranteed master lease held by some community agency. **B.4.2**

THE DOWNTOWN PLAN'S IMPACT

With regard to the western South of Market, the Downtown Plan states a general goal of protecting the existing affordable housing, but is generally silent on protection for the existing small businesses. **B.4.1**

That goal is laudable as far as housing is concerned, but the specific provisions of the Downtown Plan are not only inadequate to realize this self-proclaimed objective, but actually work against it. **B.4.2**

It is true that the Plan itself proposes that any new project which would result in the conversion or demolition of existing housing in the C3-S District (the western South of Market north of Folsom Street) would be subject to conditional use approval by the City Planning Commission. **B.4.2**

But this is in practice a very weak form of protection. Its fundamental problem is that it is applied, by definition, on a case by case basis. This necessarily establishes an adversary procedure. Consider: **B.4.2**

- a developer who wishes to remove housing, may have a very attractive proposal that appears to meet other desireable public interest purposes however identified, who is clearly at financial risk already if the project is turned down, who may have acquired the property in the past when regulations were less strict and thereby cites that 'the rules have been changed' as an unfair constraint on this particular project, and who may well marshall extensive and sophisticated public relations and political support, including support from some community organization which stands to gain in some way from the project; **B.4**

- on the other side, a few tenants of the threatened property with support from neighborhood groups and/or legal aid associations citing this project as one more displacing instance. B.4.2

This lineup is by no means theorectical, but in fact describes specific project encounters that have occured before the City Planning Commission in recent years in various neighborhoods. In several cases the developer has won approval for the project, subject to greater or lesser degrees of specific 'mitigations'. For this demonstrable reason, conditional use procedures cannot be analytically presumed to protect existing affordable housing, especially in a legal/technical document such as the Downtown Plan DEIR. B.4.2

It is also true that as a second protective measure for affordable housing in the South of Market, the Downtown Plan identifies an intended companion ordinance (but which is not technically a component of the Downtown Plan ordinance and hence must be identified legally as a proposed "mitigation measure") a new City law which would 'prohibit' conversion or demolition of existing housing, except under certain conditions and with certain offsetting requirements, such as payment of a fee or construction of replacement housing. B.4.2

But this ordinance, in draft form as these comments are prepared, as written will not necessarily forbid the demolition of existing housing in the South of Market. Moreover, its adoption without the addition of further loopholes in its protection during the legislative process (including 'grandfahering') that might further weaken its protections cannot be presumed. In a DEIR it cannot be counted against the impacts of the Downtown Plan that would lead otherwise to the loss of more affordable housing, but only proposed as a mitigation that may or may not be adopted. B.4.2

And what does the Downtown Plan actually propose for the western South of Market that lies within the C3-S District? Essentially, development rules that will permit and even encourage new commercial office buildings, to the extent that the real estate market can supply tenants willing to locate in this area at office rent levels significantly below those in the C3-O District. B.4.2 A.4

The basic problem, the key impact of the Downtown Plan here is the proposed basic floor area ratio of 6:1 for new development in the C3-S District. B.4.1 B.4.2 A.4

The grave danger of that, which will be explained below, is further exacerbated by the proposed height limits in the Plan for this area, from 80 feet at a minimum to as much as 120 feet in areas that contain significant amounts of family housing, to a maximum of 240 feet along the north side of Mission Street between Seventh and Eighth Streets. A.4 B.4 Z.1

Yes, the Downtown Plan does propose that highrises be permitted to pierce into the western South of Market. A.4 Z.1

The final devastating blow in the Downtown Plan is what it fails to propose: that the several small, isolated residentially-zoned 'islands' within the C3-S District should be consolidated and expanded into one larger residential area that would encompass and protect most of the neighborhood's housing concentration. B.4.2

A "6:1" floor area ratio ("FAR") means that, without accounting for height limits (which don't matter in this regard) or other design rules (that might have a limited effect), an office developer could build a six story office building on any C3-S Districtt lot that covered the entire lot - or alternatively, a twelve story building that covered half the lot, or some other combination in between. B.1

In order to asses the impact of this provision, the possible development density of 6:1 must be compared to the density of the existing buiildings at any possible site it could be applied to. And the level of rents which office tenants could afford to pay must be compared to the rents the existing uses, residential or commerical, on that site can afford to pay. With virtually no exceptions in the western South of Market, in both cases the new development permitted would be much bigger, and much more lucrative, than the existing land uses, either residential or commerical. This obviously establishes a strong potential for profit for those property buyers seeking either long-term investment or short term speculative gain, provided that a tenant can be found for uch new development. B.1 B.4.1

The conditional use and other controls proposed in the Downtown Plan and discussed above are intended to blunt the effect of this incentive with regard to housing, but as noted they may well not accomplish this objective. With regard to the area's many existing businesses and commericals uses, there is no real protection proposed whatsoever. B.1 B.4.1 B.4.2

In recent years that South of Market has had the de facto protection of its generally 'unattractive' character (from the point of view of potential new office tenants). Sixth Street, as the City's "Skid Row", has in particular worked to discourage fancy new commercial development. But the clear intent of the Downtown Plan, especially as addressed in its proposed new height limits, is to make the South of Market west of Seventh Street viable for such uses. There is also the 'spillover' effect from the other direction, working north from Showplace Square and potentially Mission Bay or a new downtown Stadium, that would encourage new commercial development as well. A.4 B.4.1 B.4.2

The Downtown Plan EIR analysis minimizes the impact that these new rules would have on the area, basing its projections of new office space that will be built here on market absorbtion factors, not on what the rules theorectically will permit. For the purposes of projecting impacts on transit, air quality, etc., that may well be the correct approach (forgetting for the moment it still leavesout development in the M District south of Folsom Street). But for the purposes of evaluating impacts on the area's existing housing supply and bussinesses it clearly and flagrantly inadequate. B.1.1 B.4

The obvious reason for that is that, as described above, what a buyer will pay for a property, and what happens to that property after it has changed hands, basically depends not on what will actually be built based on market absorbtion factors, but on the buyer's business judgement and expectations! B.4

Every buyer believes that it is their intended new project that will be built and that it will be the other guys' that will fail! This is one of the basic laws of real estate and human nature, and woe be the city planner or environmental consultant that ignores this elementary fact of life. A second fact of life well evidenced by contemporary Planning Commission experience is that some individuals do not always 'play by the rules,' that is, they may successfully find means to frustrate the intent of such regulatory measures as the Hotel Conversion Ordinance or conditional use requirements, and hence they value a potential property acquisition based on a more lucrative new use in spite of officially stated Planning Department goals to th contrary. B.4

Thus the Downtown Plan DEIR should take all these expectations and associated market dynamics into account in its analysis. When it does, it will have to acknowledge the the Downtown Plan will indeed result in some speculative property buying in the western South of Market with the resulting displacing impacts as described above on existing low-income residents and small businesses. B.4

ALTERNATIVES AND MITIGATIONS

The Downtown Plan's destructive land use impacts on the western South of Market are in no way necessary even to acheive the overall objective of the Downtown Plan to accomodate development of new office space in San Francisco as required by "market demand" through the year 2000. B.4

Alternative No. 4 evaluated in the DEIR incorporates the provisions of the 1981 study, South of Market: A Plan for San Francisco's Last Frontier which was sponsored by SPUR (San Francisco Planning and Urban Renewal Association), for the western South of Market area (that is, west of YBC). In summary, it proposes:

- For the core residential area, zoning that would not permit office development except as an "accessory" use, that is, no new rental commerical office space.

- For the area between YBC and the residential area, 'mixed use' zoning which limits office development to a Floor Area Ratio (FAR) of 2 to 1.

- For the varied commercial/residential area west of Ninth St., a stringent FAR limit on office development of 1 to 1. B.4 Z.1

If enacted, these zoning limits would effectively rule out any new office buildings in this vulnerable area, except as office space might be incorporated on one or two floors of a basically residential project, or in some new light industrial or B.4 service facility. Z.1

In its evaluation of these Alternatives, including Alternative 4, the DEIR basically repeats every methodological error noted in this report regarding the DEIR's evaluation of the Downtown Plan itself, including but not limited to failure to incorporate cumulative impacts of all other relevant projects, rezonings, etc., and failure to evaluate specific displacement impacts on lower-income households and small businesses in the western South of Market in particular. B.2 The entire DEIR "Alternaitves" section requires the type of massive revisions B.4 described above in order to be adequate and correct.

The key impact of Alternative 4 with regard to land use impacts in the western South of Market would be to effectively eliminate any specualtive real estate development expectations, and even the longer-term development investment possibilities in these areas insofar as they would be based on commercial office development. The result would be the prevention of the continued escalation of land vaules that can otherwise be expected to result from the impementation of the Downtown Plan. This in turn would greatly reduce the negative impacts of such land value appreciation as set forth above. B.4 The DEIR needs to present a full analysis of these impacts for Alternative 4, Z.1 and the comparable negative impacts of the other alternatives. S.1

There is a second approach evaluated within the Downtown Plan DEIR that would also afford much more protection than the Downtwon Plan, indirectly, to the western South of Market. This is the "Annual Limit" mitigation measure that would set an overall limit on the amount of new office development that could be approved for development anywhere in San Francisco in any one year. While it is not focused as a protective measure on any one neighborhood, the direct result of such a low limit as the 500,000 square foot amount analyzed would be to practically end any significant amount of office development in all but the most valuable locations. The protective effects of the annual limit for the South of Market and other center-city neighborhoods are inferred in the DEIR, but they need to be spelled out P.1 specifically for clarity.

There is a third approach which is not incorporated in the Downtown Plan, nor specifically evaluated as an alternative or mitigation in its DEIR (although Alternative 4 would be partially applicable): The enlargement and consolidation of the existing RH and RM zones which now exist in the South of Market as 'islands' within the C3-S District. These aeas were rezoned in 1977, specifically to protect the housing located in this area, but in fact they encompass less than one-third of the neighborhood's housing supply. **A.4** **N.2**

There is the obvious possibility to simply enlarge these existing zones, which effectively preclude major commerical development (except for tourist hotels in the RM District - but that is focused on Sixth Street), to include a much greater proportion of the western South of Market's housing supply. All the blocks bounded by Sixth and Twelfth, Mission and Harrison Streets are potential candidates for such enlarged RH/RM zoning. **A.4** **B.4.2** **N.2**

In general, the Planning Department in recent years has avoided the use of these traditional zoning categories as provided in the City Planning Code in favor of more complex "Special Use Districts" fashioned, in theory, to meet the specific circumstances of a given neighborhood. Whether or not this is adviseable for the South of Market, the lack of analysis of the simpler rezoning option in the DEIR, since those rules are generally understood, prevents the proper evaluation of what are the best 'tools' for the job of protecting the affordable housing there which the Downtown Plan does claim as an 'objective'. This is an inadequacy that further obfuscates this critical issue in the DEIR. **A.4** **N.2** **Z.1**

Finally, in the DEIR section titled "Reasons for Selecting the Preferred Alternative" (that is, the parts of the Downtown Plan actually proposed for legislation), the true values of the Department of City Planning are laid bare: "The Plan was preferred because it recognizes the need to provide jobs and to continue San Francisco's role as an international center of commerce and services." The text goes on to principally discuss architectural design matters, with vague references to "liveability". **Q.5**

By ommission, the residents and the small businesses of the South of Market are clearly deemed to be expendable in this pursuit of "jobs" (most of which will be taken by new commuters) and international status. The Department is honest in admitting its values, but it cannot assume those values are shared by most San Franciscans - the fact of the matter may well be that they are not. **Q.5**

(D) RESIDENCE PATTERNS AND HOUSING

The first part of this Special Section addressing "Land Use and Real Estate Impacts" discusses the Downtown Plan, its DEIR, and the large scale impacts on affordable housing in the South of Market. The particular section of the DPDEIR addressing "housing" itself should provide many more details. But it does not. **B.4.2**

It does not identify:

1. The number of housing units in the western South of Market (that is, west of Yerba Buena Center and south of Market Street), and what kind of housing they are - how many apartments by bedroom size, and how many residential hotel units. **B.4.2 D.1**

2. The status of these residential properties - vacancies, how many buildings of what types are vacant, rent leels by housing type/size, how many are condemned, etc. **B.4.2 D.1**

3. The demographic characteristics of the residents of the wetsern South of Market - age, household size, income, ethinic distribution, etc. **B.4.2 D.1**

4. Changes in these vital statistics in recent years (1980 and 1984 at least). **B.4.2 D.1**

This information is generally available. Much was presented in the Yerba Buena Center Final Environmental Impact Report Second Supplement of 1982 (82.35E), generally a far superior technical document than the Downtown Plan DEIR, which is hereby incorporated in these comments by this reference (pages 67-72 of the Draft, and 24-66 of the Comments and Responses). There is, of course, the information from the 1980 census. There are several prior City Planning data collections regarding much of this information as well. The DEIR is indefensibly inadequate in failing to present the information that is readily available without new data collection efforts. **B.4.2 D.1**

Ignoring this real world human detail makes it much easier for the DEIR to ignore as well the issues of displacement of lower-income residents. Of the eighty pages of discussion of housing impacts, the DEIR contains only four paragraphs discussing possible impacts of this type for the City as a whole. The specific terms "displacement" and "gentrification" are never even printed in this part of the DEIR. **B.4.2 D.4**

Given the ripple effects of the Downtown Plan on real estate values in the South of Market described in these comments, those impacts will be massive. Without any major change in zoning and *accompanying---concentrated--housing finance assistance*, the Downtown Plan will lead to the virtual complete displacement of all South of Market lower-income households by the year 2000. **B.4.2 D.4**

Detailed discussion is required for each of the two major housing types, residential hotels and family housing: **B.4.2**

Residential Hotels

The most recent telephone survey of South of Market residential hotels conducted by Tenants and Owners Development Corp. (TODCO) in October of 1983 identified 42 hotels open for business containing 2,499 units (plus four hotels within an unidentified number of units). An additional 9 hotels containing 474 units (plus an undetermined number of units in 3 other hotels) are closed for one reason or another. And since TODCO began such surveys in 1980, at least 12 other South of Market residential hotels have been converted to other uses or demolished. The median rent (asking price only) in October 1983 was $241 per month, which was almost no change from October of 1982, but which was a large increase compared to the median rent of $130 surveyed in 1980. This survey report is included as an exhibit to these comments. B.4.2

The trends are clear: there has been both a substantial loss of residential hotels in the 1980's in the South of Market, due both to conversions and closures - 21 of 63 hotels surveyed, or _ out of three! And there has been a substantial increase, not surprisingly, in the general rent levels of vacant units in those properties that remain - 70% since 1980, which outstrips the overall inflation rate significantly. B.4.2

At the same time there has been a notable increase in "homeless" people in the South of Market and San Francisco as a whole. There are various surveys and the data is uncertain, but the City has established a specific shelter program for the homeless utilizing several residential hotels in the Tenderloin area. B.4.2

In discussing the "Setting" for the Downtown Plan EIR, this information is vital for any adequate description. In evaluating the impacts of the Downtown Plan, continuation of these trends should be expected, and estimated. The DEIR's assertion that no further loss of units is expected due to the existing Hotel Conversion Ordinance, the conditional use process proposed in the Downtown Plan for Planning Commission review of any proposed South of Market development located where housing exists, and/or a general housing conversion/demolition prohibition identified as a possible mitigation measure, is imbecilic and, if not revised by being eliminated, a concious outright lie which could not be viewed with any greater intellectual contempt by this commentor. All available current and recent evidence is 180 degrees to the contrary - this crucial supply of affordable housing in the South of Market and all downtown San rancisco has been rapidly diminishing, even since adoption of the Hotel Conversion Oridnance. Two of the major causes - public health or building code condemnations, and fires - avoid any protective regulation approach. B.4.2

In response to normal 'supply and demand' market factors, asking rents for the remaining residential hotels units have increased sharply (even in constant dollars), and one not-surprising reult is the observed increase in homeless individuals living on the streets, those who cannot afford to pay those rents. B.4.2 D.3.1

Family Housing

There are about 1,850 (1975 survey) units of "family" housing, i.e. stuido units or larger contained in walk-up 2-10 unit apartment buildings, in the South of Market. More current data is needed, but there has been much less loss of supply in this category than in the hotel housing supply. Rent levels have been increasing, but remain below City-wide averages. B.4.2

This housing resource has been of major importance to immigrant families, particularly newly arrived Filipino immigrants, and houses a significant population under 21-years of age. It is also experiencing a degree of "gentrification" as well, that is, new households composed of two or more working white adults renting apartments formerly occupied by low-income households, typically at significantly higher rents than before, and usually coupled with some property renovation (with a spiffy new exterir paint job a bare minimum). B.4.2 D.3.1

While this process helps to maintain the housing stock, it also results in human displacment. The DPDEIR needs to disucss such displacement of lower-income families and present any available information. B.4.2 D.3.1

With regard to both residential hotels and family housing in the South of Market, there is the generic inadequacy of the DEIR in addressing only the limited area within C3 District boundaries, instead of incorporating the functionally-connected adjacent areas as well - in the South of Market housing concentrations, both R-zoned 'island' areas as well as the MI District. For any area like the South of Market neighborhood where this artificial dividing line runs right down the middle, how can anyone - the Planning Commission or the public - be expected to make any real, useful sense out of an EIR like that? B.2.1 B.4.2 D.2 D.3.1

Alternatives and Mitigation

The previous comments above regarding Alternative 4's importance for South of Market housing conservation are relevant to this section as well. Moreover, the amount of new housing that could/would be developed in parts of the South of Market, especially the proposed mixed/use area immediately west of Yerba Buena Center, under Alteranative 4 needs to be estimated in order to adequately contrast it with the Downtown Plan. D.3.1

Also as noted above in the discussion regarding the YBC

Redevelopment Area is the incoporation of the intended "YBC South of Market Housing Fund" as a mitigation measure for the Downtown Plan. This is obviously relevant to the "Housing" section of the DEIR as well, and is again formally proposed hereby (copy attached) as a mitigation measure for the low-income resident displacment impacts in the whole South of Market area that the EIR should be identifying. **D.5.3**

(F) COMMUNITY SERVICES

The Downtown Plan DEIR does not discuss at all the impacts of the Plan on the many City and/or privately funded/administered/assisted health and social services located in the present C3 District and/or serving residents of the C3 District. This ommission cannot be permitted, since the Plan will have real negative impacts on these services, their present and future capacities, and their effectiveness. Human beings count under CEQA too, not just buildings.

A.4
Z.1

First, the Downtown Plan EIR must identify and list the existing social and health service facilities in the C3 District, including the South of Market, very briefly describing their activities, client demographics, etc.

A.4
Z.1

Second, the EIR must assess the negative impacts of the Plan on these services, in two categories at least:

1. For those that are located in leased premises, the future difficulty of maintaining their services, relocating their services nearby, and/or expanding their services due to the general increase in rents for such rental space that will result from the Downtown Plan, as described in the "Land Use" section of these comments. Social/health services typically rent commercial space, and hence are subject to the same displacement pressures due to rent increases, change of use, etc. as are small businesses.

A.4
B.4
Z.1

2. For all services, the consequences on client access, staff efficicancy, deliveries, etc. resulting from increased traffic impacts and lack of parking resulting from the Downtown Plan.

E.3.2
E.4.1
E.4.2

Third, the EIR must identify appropriate mitigations. Two specific measures should be:

A. Requiring new developments in the C3 District, particularly those in the existing C3-G and C3-S Districts, which include the South of Market area, to provide space for community social and health services at below-market affordable rents in place of market-rate commercial space.

Z.1
Z.2

B. Requiring new parking facilities in appropriate C3-G and C3-S locations to set aside a number of parking spaces at nominal rents for staff of health and social service providers that require cars for their work.

E.4.1
Z.1

THESE ATTACHMENTS TO THE SOUTH OF MARKET ALLIANCE COMMENT LETTER REPEAT MATERIAL IN THAT LETTER, PROVIDING MORE DETAIL. RESPONSES ARE PROVIDED AS NOTED IN THE LETTER. THESE ATTACHMENTS ARE NOT SEPARATELY CODED.

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JUN 4 1984

Special Section: THE YBC/SOUTH OF MARKET HOUSING FUND

The San Francisco Redvelopment Agency has repeatedly assured the South of Market Alliance that a $5,000,000 'fund' for use in the development of affordable houisng will be incorporated in the overall financial package resulting from the Agency's completion of the Yerba Buena Center Redevelopment Project.

Such a fund was first proposed by the Alliance in 1982, during the preparation of the "Second Supplement to the Environmental Impact Report (EIR) for Yerba Buena Center Redevelopment Area", as a necessary mitigation of the tremendous impact on the South of Market's affordable housing supply caused by Yerba Buena Center (YBC). At that time the Alliance proposed, and the EIR that was finally adopted agreed, that the possible total of four million square feet of office/hotel/commercial development proposed for YBC would inevitably lead to the "gentrification" of the South of Market's housing stock and the resulting displacement of the existing lower income neighborhood residents.

After discussions between the Alliance, the Agency, and Olympia & York, the Canadian developer of the "Yerba Buena Gardens" project which represents most (but by no means all) of the remaining YBC project, the Redevelopment Agency accepte the need for this mitigation.

Only the general idea has been described at this time. The $5 million amount will actually be an allocation of tax increment financing authority. The YBC Project area was originally established as a specific "tax increment district", which means that property tax income to the City of San Francisco can be allocated to other YBC redevelopment project uses once it exceeds theannual amount of tax payments existing before the project was first approved (1965). In fact, this 'break even' point was not achieved until 1982 due to "Proposition 13's" major reduction in property tax rates. Any such future allocation of tax increment funds, however, must be approved by the San Francisco Board of Supervisors and the Mayor as well as the Redevelopment Agency. For this reason, the Agency intends to submit in 1984 a complete 'package' for such City approval, including the YBC Gardens lease, the budget for all tax increment funds (with the housing fund), and the allocation of the income to the Agency from YBC land sales/leases, which will include a YBC cultural program and Agency administrative funding.

The South of Market Alliance recognizes that the Redevelopment Agency has made a major step forward in agreeing to the creation of such a fund. Now is the time to address the equally import question of how it should be used. Here follows this report's recommendation for the structure and program uses of thi $5 million fund.

SOUTH OF MARKET ALLIANCE
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THE YBC/SOUTH OF MARKET HOUSING FUND

1. Basic Principles: How the Fund Will Be Used.

The South of Market Alliance believes the fundamental purpose of the Housing Fund needs to be clearly stated, along with the necssary principals to accomplish that purpose:

A. The YBC/South of Market Housing Fund will mitigate the impacts of the Yerba Buena project on the affordable housing supply which is essential for the survival of the South of Market neighborhood.

B. This housing supply is contained principally in the equally important concentrations of wood frame family apartments and larger residential hotels located in the western South of Market. Use of the Housing Fund must be limited to this area.

C. The affordable housing conserved through the Fund must be maintained as permanently affordable housing. While it is understood that many individual rehabilitation projects will include private developers, sponsorship by a community-based non-profit organization is essential to assure this goal, as well as proper management and community sensitivity in meeting residents' needs.

D. Financial assistance from the Housing Fund may take many forms, such as deferred loans for 'gap financing', but none is to be used for adinistrative costs of any agency.

2. Timing and Means of Fund availibility.

There are two possible ways to provide the $5 million Fund: (a) set aside portions of the 'increment' property tax income each year until it totals the full amount; or, (b) borrow a portion or the full amount and repay it from later increment income. These two approaches could be combined, i.e., some funds can be borrowed immediately and the rest set aside year by year.

The Agency can "borrow" funds from two types of sources: by selling notes to private investors to be repaid with future increment income (tax allocation notes), or by borrowing from other existing Agency or City funds. The second alternative is more attractive since it offers the potential for interest-free loans, whereas notes must bear prevailing tax exempt interest rates, anywhere from 10% to 14% or more. There are a number of possible no-interest City fund sources given the ability for prompt repayment, but use of these would require full City approval and would tie up funds that might otherwise be used for

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other affordable housing development.

One such potential source for a temporary inter-fund no-interest loan is the "Low-income Housing Fund" set aside for development of the four "TOOR" sites in Yerba Buena Center from City Hotel Tax revenue. Several million dollars have accumlated in this fund for the final undeveloped site ("Mendelsohn House"), but they will not be required to be drawn for that projct's financing until 1986 or '87. Thus a temporary one or two year advance against YBC tax increment income is feasible.

The key question is just how soon the actual Housing Fund dollars can be used. If the recommendations set forth in this report for program uses are in fact adopted, only a portion of the Housing Fund would need to be available 'immediately', that is, in 1985, while somewhat more than half would be needed through 1986, with the balance required in '87 and '88. Given this schedule, it may be most reasonable to borrow about $2.5 million gradually in the first two years from no-interest City sources, and draw the remainder from tax increment income directly in subsequent years while also repaying the borrowed funds. This would avoid sizeable interest payments which might otherwise reduce the total Fund available.

3. Housing Fund Administration: Who Will Decide What Projects to Fund?

This fundamental question is potentially the most controversial. The South of Market Alliance has consistently proposed that the Housing Fund be held and administered by an independent 'third party', such as a local tax exempt foundation, with specific project funding applications to be reviewed by a City/Community Advisory Board (CCAB).

This approach will provide full fiscal oversight and competent financial management by an established foundation acceptable to the City, the Redevelopment Agency, and community groups. It will safeguard all concerned against concerns of political influence in the use of the Fund. It will permit the Fund to grow by accumulating interest pending actual project by project financing payments.

Very importantly, when the Housing Fund is be first established, the types of programs and eligible uses would be spelled out in advance, providing for full coordination with other City housing programs.

The City/Community Advisory Board which would recommend speicific projects for funding to the foundation would be equally representative of public agencies and the private sector on the one hand and South of Market community organizations on the other. This would further ensure overall coordination with other City housing efforts and proper project oversight. A likely advisory board composition would include members selected by the Redevelopment Agency, the Mayor's Office of Housing and Economic Development, the Chief Administrative Officer, and private sector housing rehabilitation and finance experts along with a balancing number of community representatives.

This report recommends a special approach to the conservation of affordable family housing in the South of Market due to the technical difficulties of that critical segment of the housing supply. But with regard to financial assistance for residential hotels, the process of project assistance would be open and competitive, with proposals from nn-profit sponsors requested periodically, to be judged against established criteria that will be adopted by the CCAB.

While outright grants would not be ruled out, the more likely form of assistance would be deferred mortgage financing secured by the assisted properties. The loan would be held by the foundation which would ultimetly assure compliance with project conditions, such as the critical matter of permanent affordability, or which alternatively could assign those rights to another enforcement-oriented agency.

If and when the deferred loans were repaid, those funds would be recycled for future YBC/SOM Housing Fund use.

4. Use of the Housing Fund: Two Major Program Types - Conservation of Residential Hotels, and Protection for Affordable Family Housing.

The basic concept for preservation of affordable housing is now well established in San Francisco: a public interest non-profit organization buys, rehabilitates, manages, and rents at reduced levels existing housing in target neighborhoods. The financing used to acheive this may well include a private partner, in a role as limited as tax shelter syndication or as involved as the buyer/packager/construction contractor/management agent. Most such efforts to date have been financed utilizing City-administered federal Community Development (CD) funds, federal "Section 8" rehabilitation rent-supplements, or various low-interest loan programs. More exotic and technically complex financing assistance has been provided i some cases with federal Urban Development Action Grants (UDAG), and in others by linkage with the City's "Office/Housing Production Program" (OHPP).

The question that must be addressed here is how to adapt such a general concept to the South of Market's existing housing stock. There is no doubt this neighborhood presents unique challenges.

As described in this Neighborhood Plan, the South of Market's affordable housing stock is principally divided into two very different housing types, residential hotels and wood frame,

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walk-up family apartments. The resident groups of each are certainly distinct in terms household size, background, housing service needs and expectation, social service needs, etc. The two housing types themselves are very different in technical terms, such as building construction types, code requirements, financing requirements and conditions, and last but not least, sheer size.

The two common elements are that the supply of both as affordable housing is diminishing, and that any effort to conserve either requires some form of 'gap financing', that is, that the costs of purchase, rehabilitation, and operation cannot be supported through affordable rents, tax shelters syndication, and below-market financing alone.

The South of Market Alliance recommends that the YBC/SOM Housing Fund be equally divided between these two housing types - that $2.5 million of assistance be programatically allocated to preserving existing affordable family housing, and that $2.5 million be devoted to residential hotel conservation. These are the recommended programs for each housing type:

I. Preservation of Affordable Family Housing

Most of the South of Market's approximately 1,850 (1975) units of family housing are within 3 to 10 unit, wood frame, walk-up apartment buildings sited on small individual lots lining the many alleys which criss-cross the western South of Market. Very few of these buildings stand empty, which necessitates careful rehabilitation and housing assistance that is very sensitive to the existing residents. While Filipino families form the largest ethnic group, there are substantial numbers of Black, Latin, and White families as well. Nearly all households are renters, not owners. The buildings themselves were constructed during the period from 1910 to 1930, and while most need major repairs and have code violations, they are presently habitable.

Rent levels are modest by city-wide standards, approximating an average of $300 to $400 per month for a two-bedroom apartment. Most renter households are definitely low-income by government standards, although a significant number are two- or even three-earner households, reflecting extended families and working teenagers. Property prices have leveled off since the tremendous run-up in the real estate boom years of 1977-82, and multi-unit uildings can still be purchased on the open market for $35-50,000 per unit.

This existing situation presents an obvious opportunity to secure 100-200 units of permanently affordable family housing with the YBC/SOM Housing Fund alone, plus further program expansion once an effort is well underway and other possible financial assistance is secured. Since there is presently no organized effort now to address this critically important family housing, such a beginning will be a major acheivement for the Housing Fund in itself.

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But the small scale, separate, rented-out character of this family housing stock presents significant technical problems that must be addressed and solved in order for such a program to succeed. Here is a beginning list:

a. Rehabilitating occupied properties without displacement or undue disruption is difficult, slow, and therefore notably more expensive - and controversial - than working with vacant buildings.

b. Identifying which buildings ought to be purchased as part of an affordable housing program - and therefore what residents will benefit as a result - depends basically on which buildings are for sale at any given time. While random and thereby presumably impartial, this reality does not relate to what tenants may be in the greatest need.

c. The fact that any program will have to aquire two dozen or more small apartment buildings is a logistical workload in itself that mandates a single central entity for efficiancy and sound project management.

d. No such community-based entity now exists.

e. Any program must have the continued support of those residents involved. With such a diverse population, great sensitivitiy will be necessary to respect the differing expectations, especially given the multiple ethnic communities that will participate.

f. Arranging financing for two dozen or more separate properties within one program is inherently complicated.

This list is not prohibitive, but it is formidible. As noted, there are not presently any San Francisco organizations that have carried out a comparable effort. Elsewhere around the country, though, similar efforts have been undertaken. One nearby in Oakland created a "scattered site cooperative" from comparable small apartment buildings which were moved to make way for construction of the Grove/Shafter Freeway - but all these structures were vacant. Other comparable prototype projects have been carried out in inner-city neighborhoods of Minneapolis, Baltimore, and other midwestern and eastern cities.

The Oakland program was conceived and established by the State Office of Housing and Community Development during the Brown administration. The Minneapolis program was instituted and administered by a non-profit foundation, the Honeywell Foundation, which was established for this purpse by Honeywell Corp., headquartered in that city. The Baltimore program was developed by a similar foundation, the Enterprise Foundation, established in 1982 by developer James Rouse.

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The South of Market Alliance recommends that such experienced outside professional public-interest technical assistance be actively sought to develop and carry out a South of Market affordable family housing program, with one-half of the YBC/South of Market Housing Fund available and intended for use as 'gap financing' in such a program. Given City support, and the other financial resources - such as tax-exempt mortgage underwriting from the Redevelopment Agency - that can be 'leveraged' based on this crucial funding commitment, there is a realistic potential for a precendent-setting and successful program.

In order to bring this result about, the following steps are necessary - some of which can be begun now even before final City action on the overall YBC financing deal:

1. The Redevelopment Agency and the Mayor's Office of Housing and Economic Development determine that this concept should be explored.

2. Contacts are initiated through appropriate intermediaries with the Enterprise Foundatioion, the Honeywell Foundation, and similar national agencies to determine if they are interested in such an effort in San Francisco. Such exploratory discussions should involve as major participants South of Market community organizations.

3. Based on these contacts, possible program approaches are eviewed by both the City and community groups. If there is mutual support, a formal proposal would be requested from one or more of the specialist organizations.

At this point there would be a general public review of the concept, the specific proposal(s). It would be best if this much could be accomplished by the time the City finally acts on the YBC financing package, since it would document how one-half of the Housing Fund would be utilized. That would form the basis for sound public policy decisions by all concerned.

II. Conservation of Residential Hotels

As described in this report, more tha 3,000 residential hotel housing units still remain in the South of Market, at least in theory (not taking into account those which are bombed-out and unihabitable, or those which have been illegally converted to other uses). TODCO's most recent survey identified 13 of the 59 remaining hotels standing vacant. The actual number of occupied units continues to gradually decline, due to both physical decay of the structures and persistent conversion to tourist use. While Sixth Street remains as the largest single concentration of residential hotels, many are scattered througout the western South of Market along the major streets.

The building types vary greatly, from wood frame structures with less than 50 units to brick, masonry, or concrete buildings with more than 100 rooms. Man buildings have composite structure (part brick, part wood, etc.). Soils conditions are very significant: parts of the South of Market lie on very poor fill, accounting for the observeable settlement of some buildings and the great amount of damage the area suffered in the 1906 San Francisco Earthquake (prior to the Fire).

For purposes of a hotel conservation program, these existing conditions offer both possibilities and real constraints. Vacant buildings, while requiring extensive rehabilitation work, are more easily renovated and present no short term tenant relocation problems. On the other hand, some structures are structurally unsound due to poor soils and foundation conditions that cannot be corrected at any reasonable cost - these structures are essentially doomed. Other hotels are 'in between', capable of reinforcement that will permit a few more decades of use (but the underlying land value is the major long term financing consideration, and 'permanent affordability' cannot a meaningful objective for the existing building's units).

The value of these properties as reflected in sales prices has also leveled off since the dramatic increases of the late '70's. Some observors have attributed this to the adoption of the City's rent control and "hotel conservation" ordinances (as well as recession-caused cooling of the overall real estate market). More detailed analysis, however, shows that the profit or income that can be extracted from such hotels by owners, or operators with master leases, has reached plateau reflecting the maximum monthly rent of about $250 which reflects 'what the market will bear'(roughly one-half of current Supplemental Security Income (SSI) assistance levels). This ceiling on potential operating profit does translate into a maximum amount any buyer can pay. Of course if the hotel is large enough and has the right location so that it can be converted to much more lucrative daily tourist use (like the Pickwick Hotel at Fifth and Mission Streets) or demolished and replaced with a new office building, then its value and sales price is much greater. As a practical matter, neither circumstance applies to Sixth Street - Skid Row - but other South of Market hotels near to Civc Center or Yerba Buena Center are such likely candidates.

Given this market, there are significant opportiunities for acquisition of residential hotels in 1984 and possibly '85. The present City-enacted 'moratorium' on new development in the area should take some steam out of the speculative buying market, and prices of less-favorably located hotels have remained steady in the range of $10-15,000 per unit.

Rehabilitation costs vary widely from one hotel to another. If a very few might require as little of $5,000 per unit of work for code violations and management needs, most projects would cost between $10-15,000 per unit to put into good long-term condition, an amount roughly equal to the acquistion cost.

Approprite rent levels to set, on the other hand, to rovide 'affordable housing' can provide little cash flow with which to pay back any mortgage financing. Generally, community organizations seek to limit rents to about $200 per month for a decent, safe, and sanitary residential hotel room, and this assumes no unusually high vacancy rate (more than 10%) that might result from such negative living environments as Skid Row - Sixth Street, where so many South of Market hotels are located.

As a result, the 'gap financing' required for each affordable, rehabilitated hotel unit is sizeable, if not quite as great as that for family apartments - in the range of $10-20,000 per unit, depending on all the variables.

But unlike family apartments, there are a number of existing community organizations and agencies in San Francisco that are actively involved in programs to buy, rehabilitate, and conserve residential hotels as affordable housing. Some, such as the St.Vincent De Paul Society, envision 'public/private partnerships' that will accomplish hotel-focused programs, in this case the "Islands of Sobriety" or "Sober Hotels" project now beginning under City auspices. Others, such as the Chinatown Community Housing Corportaion, are utilizing Community Development Grants from the City to own and operate affordable housing for their communities. Still others, such as TODCO, are seeking to conserve specific hotels as part of associated commercial development projects. And this is only a beginning of te full list.

The central point is that there already exists a fair number of competent community agencies willing and able to take on residential hotel conservation projects, with the exception in the South of Market of the Sixth Street-Skid Row area.

Given this potential, the South of Market Alliance believes the appropriate allocation of the $2.5 million portion of the YBC/SOM Housing Fund devoted to hotel conservation can best be accomplished through open requests for proposals (RFP), where projects proposed by non-profit sponsors will be competitively evaluated by the City/Community Advisory Board described above.

However, noting that such a process is not likely to address the special circumstances of Sixth Street, The Alliance believes that a certain portion of the Housing Fund sould be specifically reserved for hotel conservation projects there, at least $1 million, with the intent of a coordinated City/community effort to meet the special requirements of stabalizing that part of the South of Market community (please see the special section of this report addressing Sixth Street).

Given various possibilities to 'leverage' the Housing Fund monies with other programs, tax syndication, etc., etc., the $2.5 million set aside for residential hotels could secure 200 - 250 affordable units in 3 to 6 separate hotel projects. Again, this program would have great significance as a beginning effort, one that can be further expanded given a successful start.

Since this proposed program is very analagous to existing City-administered housing programs, the principal first step required is:

1. Representatives of community organizations and City agencies prepare a formal proposed program outline (with more technical detail than this discussion).

This outline can be prepared, as with the family housing program concept, by the time of the City approval process for the entire YBC financing/development package so there is no mystery on the intended use of the associated YBC/South of Market Housing Fund. The process of preparing the outline will essentially draw together many of those who will ultimately beomce members of the City/Community Advisory Board, a good shared beginning in itself.

END OF THIS SECTION

SOUTH OF MARKET
RESIDENTIAL HOTEL
RENT SURVEY

Prepared by

TENANTS & OWNERS DEVELOPMENT CORP.

October, 1983

SOUTH OF MARKET HOTEL SURVEY

Name & Address		Status	Units	Rent 10/82	Rent 10/83
1. No Name	490 Bryant	Closed	12		For Lease
2. Lifeline	917 Folsom	Closed		100/Mo.	For Lease
3. Park Hotel	1040 Folsom	100%	30	220/Mo.	300/Mo.
4. Folsom St.	1092 Folsom	100%	58	392/Mo/	400/Mo.
5. No Name	973 Harrison	Closed	48		
6. No Name	906 Howard	Open	46		
7. Orlando Hotel	995 Howard	100%	52	200/Mo.	200/Mo.
8. Raymond Hotel	1011 Howard	100%		220/Mo.	220/Mo.
9. Auburn Hotel	481 Minna	Open	79		
10. Chronical	936 Mission	100%	157	280/Mo.	225/Mo.
11. A'kain	948 Mission	100%	57	200/Mo.	240/Mo.
12. Kean Hotel	1018 Mission	100%	67	200/Mo.	200/Mo.
13. Potter Hotel	1288 Mission	100%	102	160/Mo.	220/Mo.
14. No Name	22 So. Park	Closed	50		
15. Bryant Hotel	84 So. Park	Closed	22		
16. Parkview	102 So. Park	Closed	51		
17. Grand Fillipino	106 So. Park	open	22		
18. New Pullman	232 Townsend	100%	49	65/Mo..	85/Mo.
19. Bunkhouse	38 Washburn	Open	25		
20. Victorian	54 4th St.	85%	168	340/Mo.	340/MO.
21. Washington	652 4th St.	Closed	55		
22. Oakwood	44 5th ST.	100%	70	G.A. Voucher only	
23. No Name	374 5th ST.	Closed			For Sale

					10/82	10/83
24.	Windsor Hotel	20 6th St.	100%		200/Mo.	210/Mo.
25.	Hotel Seneca	34 6th ST.	100%	2	280/MO.	Daily only
26.	Rays Hotel	35 6th ST.	Open	16		
27.	Whitaker Hotel	41 6th ST.	Open	14		
28.	Desmond Hotel	42 6th St.	100%	28	180/Mo.	165/Mo.
29.	No Name	45 6th ST.	Open	15		
30.	Lawrence	48 6th St.	100%	41	200/Mo.	220/Mo.
31.	Hillsdale	51 6th ST.	100%	82	260/Mo.	Daily Only
32.	Home Hotel	68 6th St.	Open	29		
33.	Baldwin Hotel	74 6th St.	100%	192	200/Mo.	220/Mo.
34.	Delta Hotel	88 6th St.	100%	51	180/Mo.	G.A. Vouchers Only
35.	Hart Hotel	93 6th ST.	100%	31	220/Mo.	220/Mo.
36.	Hunter Hotel	102 6th St.	Open	11		
37.	Henry Hotel	106 6th ST.	90%	132	240/Mo.	255/Mo.
38.	Hotel Rose	125 6th ST.	95%	97	200/Mo.	No info
39.	Sunnyside	135 6th ST.	100%	57	200/Mo.	200/Mo.
40.	No Name	136 6th St	Closed	10		
41.	Pontiac Hotel	138 6th St.	Closed	76		
42.	Minnalee Hotel	149 6th ST.	95%	51	200/Mo	200/Mo.
43.	United Hotel	152 6th St.	Open	15		
44.	St. Cloud	162 6th St.	Open	22		
45.	Dudley Hotel	172 6th St.	Open	22		
46.	Alder Hotel	175 6th St.	100%	123	220/Mo.	No info
47.	NO Name	184 6th St.	Closed			
48.	~~Oakl~~and Hotel ORLANDO	201 6th St.	Open	Burned.		

					10/82	10/83
49.	Harriet Hotel	220 6th ST.	Open	5		
50.	Sharon Hotel	226 6th St.	50%	37	150/MO.	240/Mo.
51.	Anglo Hotel	241 6th ST.	100%	125	180/Mo.	200/Mo.
52.	No Name	538 6th ST.	Demolished	18		
53.	Gina Hotel	221 7th ST.	Open	24		
54.	Blackstone	81 9th St.	Open (Remod.)	20	125/Mo.	300/Mo.
55.	Eldorodo Hotel	150 9th St.	100%		400/Mo.	Homeless Program
56.	Phillips Hotel	205 9th ST.	75%		330/Mo.	350/Mo.
57.	Normandie	251 9th St.	Open			
58.	Jessie Hotel	179 Jessie	Closed	150		
59.	Utah Hotel	504 4th St.	Open	15		

The following Hotels are deleted from the Survey:

1.	No Name	995 Harrison	Apartment	1981
2.	No Name	1068 Howard	Apartment	1983
3.	No Name	120 10th St.	Apartment	
4.	No Name	315 5th St.	Demolished	
5.	Embarcadero	146 Embarcadero	Tourist Hotel	1981
6.	YMCA	166 Embarcadero	Tourist Hotel	1981
7.	Anxious Arms	964 Howard	Tourist Hotel	1981
8.	Bay Brick Inn	1188 Folsom	Tourist Hotel	1983
9.	Convention Inn	259 7th St.	Tourist Hotel	1983
10.	New Frontier	1147 Folsom	Fire, Demolished	1982
11.	Planters Hotel	286 2nd St	Office	1981
12.	No Name	527 Bryant	Restaurant	1982
13.	Pickwick Hotel	85 5th St.	Tourist Hotel	1981
14.	Yerba Buena	55 5th St.	Tourist Hotel	1981

SUMMARY

Within the South of Market Area, a recent survey revealed that there is 59 Residential Hotels, with 46 of them operating. For those hotel in operation, rent information*shows a range from $85.00 to $400.00 per month. The medium rent on the South of Market Hotels are $237.00, almost no change from a year ago at $238.00. The medium rent for sixth Street Hotels is $213.00, a 4% or $8.00 increase from last year. Two of the hotels on Sixth St. (Hotel Seneca and Hillsdale) are on daily basis only. The Oakwood and Delta Hotel only accept G.A. Vouchers. The Eldorado Hotel is contract to the City for the Homeless Program.
The Lifeline Hotel and 490 Bryant are both for lease, and 374 5th St. is for sale. 538 6th ST. has been demolished into a parking lot. Dudley Hotel has change it's name to Dudley Apartment and Bunkhouse on 38 Washburn has also turn to apartment.
The following Hotels are deleted from the list due to various reasons as described below:
Change to Apartments: 1) 1068 Howard St. 2) 120 Tenth St. 3) 995 Harrison St. (Not sure of change, but do see people occupy in it.)
Demolished: 1) 315 Folsom St.
Change to Tourist Hotel or Daily Rates only: 1)Embarcadero Hotel 2)YMCA, 3) Anxious Arms, 4) Bay Brick Inn (a woman only hotel, use to be the Brown Hotel), 5)Convention Inn (use to be Bus Stop Hotel).
The New Frontier Hotel which is destroyed by fire, is now site of an apartment. The Planter Hotel in now an office building.
Most of the Hotels charge the same rent from a year ago, some decreased in rent and the ones that charge higher are the ones that done some remodeling works.

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*The rent information are not complete due to the non-cooperation of the owners & Managers or the surveyor could not contact the management.

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DEPT. OF CITY PLANNING

4 June 1984

STATEMENT OF THE COUNCIL OF COMMUNITY HOUSING ORGANIZATIONS ON THE DEIR OF THE DOWNTOWN PLAN

Introduction

The following statement addresses exclusively the subject of housing in the context of the proposed policy changes suggested by the Downtown Plan. Other groups and community organizations will address transit, resident employment, and other aspects of the enviornment impacted by the Downtown Plan and studied in this DEIR. However, CCHO would like to note that while housing is our primary concern, especially affordable housing, it is only one aspect of the problem posed by the primary Downtown Plan policy which is to allow an ever increasing amount of highrise commercial office development in our City. We understand the inter-related character of issues discussed in the DEIR. If the City cannot accomodate the housing needs of the projected workforce caused by the Downtown Plan, then an increased impact and demand will be placed on public transit since that workforce will have to commute to work. Moreover, an inability to house the projected workforce will also impact existing residential neighborhoods in our City by increasing the demand on the already over burdened housing stock. Thus, an error in the DEIR's analysis of the housing question will have a ripple effect through the entire DEIR. We expect that all errors noted in the following will be corrected and changes made to reflect the correction throughout the entire DEIR. **B.4.2**
D.2.2

Also included for staff review and comment is a seperate analysis of the current OHPP, **D.3.1** entitled "A CRITIQUE OF SAN FRANCISCO'S OFFICE HOUSING PRODUCTION PROGRAM WITH RECOMMENDATIONS FOR CORRECTIVE ACTION". This document should be considered as part of this statemen as it is the only study thus far on the entire operational history of this program.
D.5.1

Summary

The DEIR is marred by an incomplete discussion of the existing houisng setting and by the use of incorrect and outdated data on future housing construction. These two serious flaws render the DEIR section dealing with housing incomplete and inaccurate. Major revisions of the DEIR's analysis of the housing impacts must be made. As noted above, these revisions on the housing section will also require a major revision of the transit and other sections of the DEIR. The effect of these errors of analysis in the DEIR is to greatly understate the harmful, negative and aviodable impacts of the Downtown Plan on the City's housing stock, especially the low and moderate cost housing stock in the downtown area. As a result of this understatement of the impacts, proper corrective policies are simply ignored in the DEIR.

B.4
D.2
D.3
D.4
D.5
E.1
E.2

INCOMPLETE DISCUSSION OF EXISTING HOUSING SETTING

A stated major objective of the Downtown Plan, repeated in the Summary of this DEIR is:

> "expand the supply of housing in and adjacent to downtown, and protect such residential uses from encroachment by commercial uses" (DEIR,p.I.2) **B.4.2** **Z.1**

In order to correctly analyze such a policy there first must be a detailed description of the existing houisng stock in the study area. No such description occurs in the DEIR. Even more serious, after merely stating this "objective", the DEIR offers no other discussion of it's implementation . As a minimum the following questions should be posed and answered by the final EIR: **B.4.2**

1. total number of existing dwelling units in area effected by Downtown Plan;
2. number and rent/housing cost of residents now in these dwelling units;
3. number and location of SRO's in study area;
4. number and location of existing family housing in study area;
5. number and per cent of City's total of subsidised senior housing units in study area
6. probable impact of Downtown Plan polices on SRO's, family housing and subsidised senior housing in study area;
7. estimated number of low income households dispalced by Downtown Plan policies;
8. policies suggested to "expand" and "protect" existing low cost housing in study area. **B.4.2**

The failure to pose, let alone answer these key questions underates the harmful possible impact of the Downtown Plan policies and simply ignore an "objective" of the Downtown Plan. **Z.1**

LACK OF DISCUSSION OF AFFORDABILITY FACTOR IN EXISTING HOUSING STOCK

By failing to pose the above listed questions the DEIR fails to take notice of an important fact: Chinatown, the Tenderloin and the South of Market neighborhoods posses a vast number of the Citys stock of affordable housing. Yet,these neighborhoods are on "the front lines" of the changes expected to result from the Downtown Plan. This fact was at least acknowledged in the Downtown Plan itself when on page 39 of that document stated:

> "As the downtown office district continues to grow, the pressure to demolish housing or convert it to nonresidential uses will increase...areas most affected are the South of Market...,North of Market(Tenderloin), Chinatown, and North Beach neighborhoods". **B.4.2** **Z.1**

Where is the detailed discussion of these expected demolitions and conversions? What plans or polices are to be used by the City to build new affordable housing for existing residents? How many units will need to be replaced?

INACCURATE DISCUSSION OF FUTURE HOUSING NEEDS

B.4.2

By ignoring the need to expand and protect the existing supply of affordable housing and by overstating the average "expected" supply of housing, the DEIR greatly understates the housing shortage caused by Downtown Plan policies.

D.2.2

The DEIR assumes that between 1981 and 2000 some 35,000 new, resident C-3 workers will need to be housed in San Francisco as a result of Downtown Plan policies (Table IV.D.15, page IV.D.64). Yet, nowhere in the DEIR is it mentioned how many dwelling units will need to be produced to house them. Moreover, no figures at all are supplied on how many units will be needed or produced for the years 1981 to 1990. The only detailed discussion of future housing supply is to be found on pages IV.D.61-63. This discussion assumes a "most likly scenario" of housing production for the decade 1990 to 2000. This discussion is based on a series of assumptions listed in Appendix I(DEIR, Vol.2, ppI.1-33). Appendix I, in turn, proves to be yet another set of assumptions which, simply put, assumes that the more people drawn to the city to work, the more housing will be needed. On the production side, both footnotes 43 and 44 (page IV.D.93-4) and Appendix I place total reliance on the figures on housing production to be found in the Residence Element of the Master Plan (dated Janurary 1982). **D.2.2**

According to this discussion of the"most likly scenario" for housing production, the DEIR assumes that some 13,000 to 13,500 units will be produced in the 1990-2000 period. They assume the following breakdown for these numbers:

10,000 units	1000 units a year "average addition to housing stock"
200 units	as produced over the 10 year period as a result of the C-3 "houisng bonus" of the Downtown Plan
2800-3300 units	over the lo year period as a result of the OHPP
13-13,500 units	total

Even this admittedly partial projection is groundless and hopelessly optimistic. It should be totally revised for the following reasons: **D.2.2**

ONE: The most likly housing scenario is based upon outdated Department of City Planning estimates. The DEIR used the 1982 Resident Element to base it's projections. However, in May, 1984 the DCP issued a revised Draft Resident Element which dramatically reduced the number of houising units projected to be built in the "mixed residential -commercial use areas" (see Table 27, page 1.24, Draft Residence Element, May, 1984, DCP). The 1982 Residence Element assumed a total of some 26,000 new units to be built in the neighborhoods surrounding downtown(see Table 26, page 1.23). The May, 1984 document revises thoes projections downward to some 16,000 units (op.cit.); a reduction of some 10,000 units or the total amount assumed by the DEIR to be produced as an "average addition to the housing stock" as noted above. It is interesting to note that the sub areas listed in the revised Residence Element with the greatest loss of projected housing (Tenderloin,2000-4000 projected "loss" and the South of Market with a 8,000 unit loss)are the same neighborhoods listed in the Downtown Plan as being subject to loss of housing as a result of the expanding commercial office development projected by the Downtown Plan. **B.4.2**
D.2.2

TWO: The OHPP projections seem to be counted twice, once in the overall "average addition" (see fourth paragraph of Appendix I, page I.16) and once alone as the "OHPP bonus". Moreover, there is some confusion on the way the DEIR defines an OHPP "unit" of housing. As the enclosed study, "A CRITIQUE ..." points out (pages 3 and 7) there are a number of ways the DCP "counts" OHPP housing units. While some 6,298 units have be assesed, only 4,136 units of "credits" have been awarded developers. Moreover, these units of credit actually represent, because of the "bonus system" allowed under OHPP, some 2,304 actual housing units. Yet, since market rate units are allowed under OHPP, the number of actual, new, housing units produced by OHPP and able to be afforded by a majority of the C-3 office workforce numbers but 621 units. In order to accept the "most likly scenario" OHPP projection we must know just how the DEIR preparers counted them.

D.2.2
D.5.1

THREE: The DEIR uses the most optimistic projections possible of the ability of the City to build new housing. While Appendix I (page I.16) notes that only 620 units a year has been added to the City's housing stock (and that, given the existing vacancy rate and the fact that many of these new units are not available for year'round occupancy, only 370 new HOUSEHOLDS were added to the City), the "most likly scenario" still assumes that 1,000 units will be produced per year. On what basis does this projection reflect a "best estimate" or even "most likly" estimate? Nothing in the methodology used in the DEIR supports such an over estimate, let alone calling it "most likly". The May, 1984 Residence Element lists that for the period of 1980-82 inclusive, a total net addition of 1,891 dwelling units occured in San Francisco. That is an average of 630 new units per year. A proportion of course were hotel rooms, not suitable for C-3 workers, others were limited to either seniors or low income households. On what data does the DEIR project a whopping 60% increase in this actual production rate. **D.2.2**
D.3.1

Taken together, the actual likly scenario for housing the projected C-3 resident workforce would look something like this:

19,443 actual number of housing units needed to house 35,000 new workers using OHPP housing/worker formula of 1.8 C-3 workers per unit

11,970 straight line projection of actual net housing production of 630 units per year, assuming zero vacancy factor and that all units produced are residential, not hotel units, over 19 year period, 1981-2000

-7473 net housing unit deficiency caused by Downtown Plan policies. **D.2.2**
D.4

FAILURE TO ADDRESS C-3 WORKFOCE HOUSING AFFORDABILITY NEEDS

One of the most detailed aspect of the DEIR analysis of housing and the Downtown Plan is the wealth of information regarding the actual housing needs of the C-3 San Francisco workforce. There were some surprising facts in this analysis. For example, the DEIR states (Table IV.D.3) that fully 75% of the C-3 workforce lives in multi-person households and that 33% are families with children. Only 30% live in single person households. Indeed, C-3 workers in San Francisco live in larger sized households (2.5) than the San Francisco average (2.2). Moreover, fully 60% of the San Francisco C-3 workforce live in households which average less than $25,000 in annual income. Indeed, the DEIR characterizes the C-3 San Franciscan worker as "primarily renters with lower than average ages abd household incomes" (p.IV.D.15). Also surprising is that the C-3 worker households seem to stay in San Francisco longer than other household Table IV.D.4 states that C-3 worker households average some 6.5 years in their present location. **Z.1**

The data cited in the DEIR seems to clearly indicate that there is a need for affordable, large, rental housing units to meet the housing needs of the average C-3 office worker. But there is not one word of analysis on how that need is to be met. This is a gross oversight in analysis and must be corrected. The evidence is clear that the type of housing needed by C-3 workers is the exact type which is in the shortest supply currently in our City. What are the implications of that type of housing not being supplied in San Francisco? This important aspect is also left undiscussed in the DEIR. **D.4**
D.3.3.6

THE FAILURE TO ASSESS IMPACTS OF LOSS OF HOUSING OPPORTUNITY SITES

The major thrust of the Downtown Plan is to shift commercial development to the area south of Market street. yet this same area has been listed on various DCP studies as the location of various housing opportunity sites. The DEIR fails totally to even address the existence of this contr-diction, let alone list public policies which will mitigate the harmful impacts of such a loss. A.4 B.4.2

This oversight is even more surprising when one realized that the DEIR itself asserts that in future there will be a shift into "the eastern portions of the City" of the projected new workforce residential location (see page IV.D.36). Just where in the "eastern portion of the city" will these new workers live if all the potential housing sites are used for commercial development as also proposed by the Downtown Plan? B.4.2 D.2.2

The seriousiness of this problem can be seen in a comparision of the 1982 Residence Element with the post Downtown Plan 1984 version of the Residence Element. The 1982 document lists some 23 locations for "housing opportunities on publically owned land" east of the Van Ness/Freeway area (see Map A, p.1.24, 1982 Residence Element). Yet the same Map A (p.1.26) of the 1984 Residence Element lists only 2 such sites. B.4.2

As was mentioned above, the 1984 document also assumes a dramatic decline in the numbers of units projected to be built in the eastern portion of the City adjacent to downtown. The 1982 document projected some 120 housing opportunity sites in the commercial zones covered by the Downtown Plan (see MapB, p.1.25, 1982 Residence Element). The 1984 document omits such a map at all. The 1982 document lists some 11 "housing opportunity sites in Industrial zones" in the area covered by the Downtown Plan (see Map C, p.1.26). The 1984 document has no such map and makes no such listing. B.4.2

Comparing the 1982 Residence Element with the 1984 document shows a loss, as noted above, of some 10,000 possible units on these missing sites in areas covered by the Downtown Plan. What is the explination of this reduction? What is the impact on the Downtown Plan of this reduction. What changes does this loss of housing opportunity sites have in the projection that the eastern portion of the city will accomodate the expected new C-3 office workforce? Why isnt the loss of these site measured and discussed in the DEIR. B.4.2

CONCLUSION

The DEIR is grossly in error when assesing the existing supply of low and moderate housing in the study area. It understaes the housing shortages caused by the Downtown Plan policies. It does not assess the impacts on the City's total housijng stock of this shortage. It ignores the affordability needs of the projected office workforce and does not assess the loss of housing opportunity sites cause by commercial development pushed southward by the Downtown Plan development policies. By understating the housing crisis caused by an overdevlopment of highrise offices, it tends to also understate the impacts of that development on transit needs and other impacts of this growth. D.2.2

B.4.2 D.2.6
D.3.1
D.4
D.5
E.1
E.2

Submitted for the Council of Community Housing Organizations by Calvin Welch, SFIC.

San Francisco Information Clearinghouse

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A CRITIQUE OF SAN FRANCISCO'S OFFICE HOUSING PRODUCTION PROGRAM WITH RECOMMENDATIONS FOR CORRECTIVE ACTION

D.5.1 (ENTIRE DOCUMENT)

Scope of the Critique

The first objective of this study is to evaluate San Francisco's performance in fulfilling the mandate of the Office Housing Production Program. The focus is upon:

1. Program concept and design.
2. Performance in meeting stated new and affordable housing goals and relationship of that production to office highrise mitigation obligations.
3. Managerial and administrative performance.

The second objective is to, where deficiencies are identified, recommend appropriate corrective action.

Data Base Constraints

The Department of City Planning (DCP) has overall OHPP management responsibility. In practice, this is somewhat shared with the Mayor's Office of Housing and Economic Development (OHED).

They have not adopted a single, standard system for data collection, analysis and reporting. Progress reports are haphazard, employ no common format and do not comprehensively treat all concerns essential to an informed evaluation. To locate all pertinent data, a number of different sources must be consulted and these can be incomplete, contradictory or confusing.

This situation grants the Director of Planning a certain information monopoly; no outside investigator can produce an absolutely unchallengeable report on OHPP. Yet, the data base utilized for this study is considered to be sufficiently accurate to justify the major findings.

Information Sources

The SFIC consulted:

1. A variety of DCP and OHED reports including (various dates): OHPP Commitments to Housing Development; Cumulative Office Development in Downtown SF; OHPP Outstanding Requirements; Status of Housing Progress Reports Due for Office Developers; and Office Developers Housing Obligations & Commitments.
2. Project files maintained by DCP and OHED.
3. Files of the Council of Community Housing Organizations (CCHO) and San Franciscans for Reasonable Growth (SFRG) who monitor all public land use planning and community development activities.

BACKGROUND

Since the late 1970's, CCHO along with SFRG has insisted that San Francisco's housing crisis stemmed in a major measure from the demand generated by new office workers drawn to the City by the explosively rapid development of highrise office buildings.

CCHO and SFRG gave hours of testimony documenting the relationship between increasing rents, gentrification, conversions of affordable rental units and displacement and the unchecked construction of highrise office buildings.

While the factual base of the housing impact of highrise office buildings came from community groups, the design for the mitigation process that resulted - the OHPP - is totally a product of DCP staff. Community suggestions on the design and operations of the OHPP were rejected.

In accord with Interim Guidelines issued by DCP on January 22, 1982, the purpose of the OHPP is to assure "that developers of new office buildings, as employment generators, share the responsibility of increasing and preserving the City's housing stock, particularly affordable housing."

The OHPP has no seperate legal status. As presently constituted it is a "guideline" of the Planning Commission (CPC). Staff applies it to highrise office developments which the CPC, through the Environmental Impact Review (EIR) process, has determined will have significant negative impact on the City's housing crisis.

DCP staff, in reviewing the EIR of a specific office proposal, makes a determination through the application of a formula they devised, as to the specific numbers of new workers needed to be housed in San Francisco and the number of new housing units needed to be produced to house them.

The formula assumes that only 40% of the new workforce for a project will need to be housed in San Francisco. In round numbers, the formula posits that for every 1,800 square feet of new highrise construction one new housing unit must be built in the City.

The new housing demand deemed a result of each new highrise is then made part of the final EIR for that project; and, as a condition of certification of the final EIR, the developer is required to "mitigate" that housing demand.

Great discretion is granted to the Director of DCP in judging just what constitutes sufficient mitigation to satisy each OHPP obligation. Nevertheless, the intent and charge of the OHPP is quite clear. Downtown office highrise developers with a housing mitigation obligation must:

1. Produce new and affordable housing.

2. Must produce the exact number of units necessary to cover the known demand of new employees expected to reside in the City.

FINDINGS

I. Overview

The SFIC has been monitoring the OHPP since its inception, after considerable community advocacy, as a mitigation approach in 1980. In November 1983, in response to a sketchy OHPP Ordinance introduced to the Board of Supervisors by Supervisor Renne (as drafted by DCP), the SFIC determined to undertake a comprehensive evaluation of the OHPP.

The study considers data currant to the first quarter of 1984. During the period covered, thirty one highrises were assessed with a housing mitigation obligation and fifteen of these have secured final approval for their housing production scheme to satisfy that obligation. The SFIC considers that a sufficient base upon which to make the following major findings:

1. There is a demonstrated need for the OHPP program and in concept it is both workable and appropriate.

2. It suffers from critical design and management deficiencies which have prevented the OHPP from satisfactorily meeting its stated objectives.

While nearly four years have elapsed, less than half of the office projects with an OHPP obligation have secured approval on their plans for meeting that requirement. Due to program shortcommings, these will actually produce only about half of the units necessary to meet the known housing demand generated by those office projects and only 15% of this production represents newly available and low and moderate income affordable housing.

The OHPP has not only failed to maximize its potential for replacing scarce federal housing finance funds, but has failed to meet even minimal performance standards. Program operations are characterized by a closed and arbitrary "deal" negotiation process and those housing plans having final approval are marked by inequities.

The lack of well defined guidelines grants great program control to the Director of DCP; his office has choosen to exercise that authority fully and thus must accept full responsibility for the failure of the program.

II. Performance

A. Implementation Delays

Chart 1 shows that of 31 projects where a housing mitigation obligation has been assessed, only 15 have secured final approval for their housing production scheme. This does represent 65.6% of the total housing unit demand generated by all 31 projects (see Housing Obligations & Commitments overall data at end of Critique).

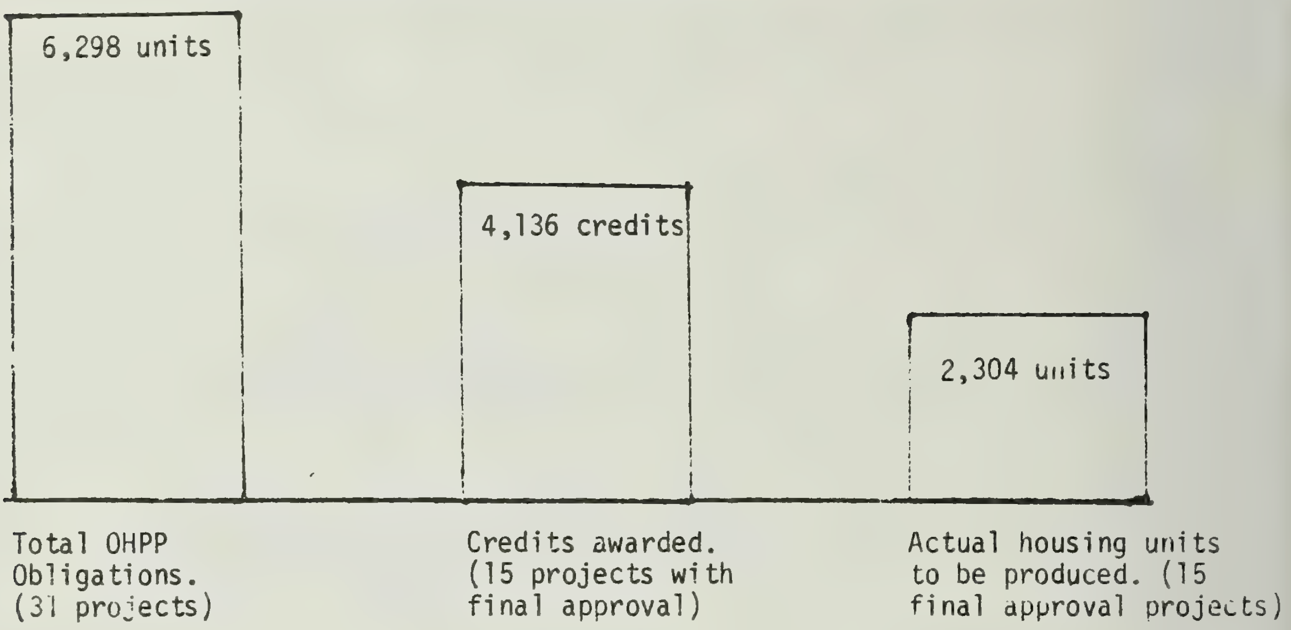
Yet, even for the 15 approved projects, there have been significant delays. For example, Lincoln Properties' 101 Mission project secured CPC approval in August, 1981 but did not receive final approval for its mitigation scheme until November, 1983.

While none of the 16 remaining projects has secured final approval (4 have preliminary approval), for a majority the office highrise is already under construction. Some in fact received their CPC building approval as far back as 1980 and 1981.

As managed by the DCP, the OHPP approval system is subject to intolerable dealys. This has acted to defeat the stated purpose of the program. It is highly likely that for a majority of projects, the office highrise will be completed and occupied, generating an immediate housing demand, months and even years before the housing units intended to meet that demand are available for occupancy.

In some cases, particularly where OHPP has been used as "gap" financing (to fill the "hole" in the financing package for an existing development), the time differential may not be as great. This is not sufficient to mitigate the negative impact of the cumulative delay of all projects; in any event, does not constitute a solution to the implementation delays experienced by the program.

Chart 1 - Housing Obligations Compared to Production



These delays are basic to design shortcommings in the OHPP "guidelines". While the OHPP formula is quite specific in determining precise housing demand, the Interim Guidelines are quite vague in specifying satisfactory mitigation criteria. Those determinations are left to the Director of DCP in whom final approval authority is vested as well as such critical decisions as the setting of cash contributions and awarding of credits.

The Director of DCP has further personalized the process by requiring that developers negotiate directly with his office and then demonstrated the arbitrary nature of that process by issuing widely varying credit and contribution determinations.

The system then requires that each developer undertake an additional time consuming negotiation process. This involves putting together the housing mitigation production scheme. Most commercial developers are not also residential housing developers. They must thus connect with a housing developer and carry out a lengthy and complex process to close a development deal. This has required the creation of new legal structures, the consolidation of several different financing sources and agreement amongst a number of different public and private sector parties.

The expeditious implementation of an OHPP obligation is nearly always dependent upon the completion of two problematic negotiations; the approval of the Director of DCP for both deals; and the usual time lag involved between the closing of a deal and the actual development of housing available for occupancy.

Another factor contributing to implementation communication and coordination problems, and thus delay, is that the Director of OHED is called upon to help put together most of the housing "deals." And OHED must then tailor a development to fit that particular OHPP obligation need. Since there are a very limited number of applicable housing developments available, OHED/DCP must either stretch the rules (issuing extra credits, etc.) or simply wait until the right project comes along.

B. Methods for Expediting Performance

The negotiated "deal" process should be eliminated. Developers should have the option of a)directly developing the required housing themselves or b) paying a fixed amount into a City housing production finance pool.

DCP's role in the entire process should be limited to permit, EIR and OHPP review. Performance certifications for OHPP would come from OHED who will operate the finance pool (as it presently does for the successful Site Acquisition and City Housing Rehab pools) and monitor developer compliance when they undertake housing development.

III. The Credit System

A. The Extra Credit Loophole

Based upon a scientific analysis of the impact of highrise office construction on the City's housing crisis, the OHPP concludes that for every 1.8 new employees expected to reside in the City one new housing unit must be produced.

The Interim Guidelines, however, authorize extra housing credits. Such credits can be granted for each "affordable" unit and for extra bedrooms in a unit. A developer could finance a three bedroom, lower income unit and receive four credits which can be directly substituted for four real demand units of OHPP obligation.

Chart 1 demonstrates the counterproductive impact of this major loophole. The 15 projects with final approval of their housing scheme have been credited with satisfying 4,136 units of OHPP obligation. In reality, considering extra credits awarded, only 2,304 net housing units will actually be assisted.

While the OHPP calls for one for one production to cover a known demand, in practice only 55.7% of that demand will actually be met. Thus, the OHPP has in fact merely contributed another 1,832 units to the demand side of the City's demand to supply imbalance crisis.

A review of all previous credit awards uncovers no consistent criteria or patterns. The process appears to be quite arbitrary. And the substitution of housing credits for actual housing units known to be needed to offset a defined demand results in an emphasis on making deals to secure credits rather than in fostering the straightforward provision of new housing.

Trammel-Crow, Texas developers, so impressed the Director of DCP that he awarded them one extra credit each for on site condominiums that would market for from $300,000 to $3,000,000 apiece. It is questionable whether these condos should count for even one credit each; at that incredible price and considering the in-office location they are likely to be utilized as visiting executive accomodations rather than as permanent housing.

The message to developers is that the City is less than serious with complying with the intent of the OHPP; it is not applied in an equitable and predictable manner across the board. Credit substitutions also totally undermine the legality of the program. That rests upon housing data certified in the EIR which is expressed in terms of actual housing units; the use of housing credits (which can be redeemed with varying amounts of cash contributions) could be argued to be mere "extortion" of developers.

B. Close the Credit Loophole

The credit system should be eliminated. There is no justification for the use of credits; no incentives necessary.

IV. Developer Contributions

A. Cost per Unit of Credit

The OHPP does not specify a set contribution per unit to be charged. The emphasis is on making a development deal for a number of units. That, along with gap financing and the arbitrary credit system, defies contribution standardization.

CCHO, based upon the extensive experience of its housing development corporation membership, concluded that, given the existing costs of housing finance in San Francisco, it requires an additional $26,000 per unit to write down costs so that the unit becomes lower income affordable.

Chart 2 - Developer Per Credit Contributions

Project	Total Contribution	Credits	Per Credit Cost	
Five Fremont	$ -0-	564	$ -0-	(arranged loans)
353 Sacramento	1,014,000	450	2,253	
345 California	"	"	"	
101 Mission	500,000	180	2,778	
160 Spear	-0-	250	-0-	($700,000 loan)
555 Montgomery	933,000	155	6,019	
580 California	882,000	147	6,000	
One Sansome	3,072,000	512	6,000	
580 California	588,000	146	4,027	
345 California	500,000	170	2,941	
101 Montgomery	2,440,000	610	4,000	
71 Stevenson	"	"	"	
90 New Montgomery	"	"	"	
Washington/Mont.	-0-	65	-0-	on site
" "	410,000	164	2,500	
2nd/Folsome	3,500,000	707	4,950	
466 Bush	-0-	36	-0-	on site
SF Federal	621,000	162	3,833	
Totals	$14,460,000	4,318	$3,349	

Chart 2 shows that for the first 4,318 credits awarded, the average developer contribution was $3,349 per unit (median of $3,330 per unit). What must be kept in mind is that this is what the Director of DCP "charged" on the average to developers to purchase housing "credits" not what it actually cost to produce an affordable unit.

The range is quite wide. Three developers had to put up $6,000 per credit. On the other hand, Milton Meyer & Co, for Five Fremont Center, contributed no funds whatsoever in receiving 564 credits. They simply loaned Hastings Law School $50,000 and helped them to get in touch with longer range financing for the development of accomodations for law students. Extra credits were awarded on top of that.

It may only be a coincidence, but the developer in that case, Walter Shorenstein, is known to have considerable influence at City Hall. That fact cannot have escaped the notice of other developers; provide an incentive for using influence to negotiate for the cheapest possible deal rather than placing the emphasis on creatively financing the greatest possible production of affordable units.

This "backroom deal" system also introduces an unnecessary element of uncertainty. With the floating contribution amount, developers cannot cost out their projects and housing developers cannot consolidate their financing until the Director of DCP issues his decision.

In some cases, the contribution amount is simply set by project financing need; gap financing to meet the shortfall in an existing development package. This may move along some stalled projects, but it results in inequities between OHPP developer contributions.

B. Contributions Should Reflect Actual Housing Costs

Office developers with an OHPP obligation should make a simple, fixed amount payment into a housing development pool.

The amount should be set at $12,000 per unit (and no credits awarded). This is half the amount necessary, with market financing, to produce an affordable unit. Once added to the pool, the developer contributions would be matched to a like amount in City funds. All projects promising affordable housing could seek financing from the pool.

V. Impact of OHPP on the Housing Crisis

A. Production Beneficiaries

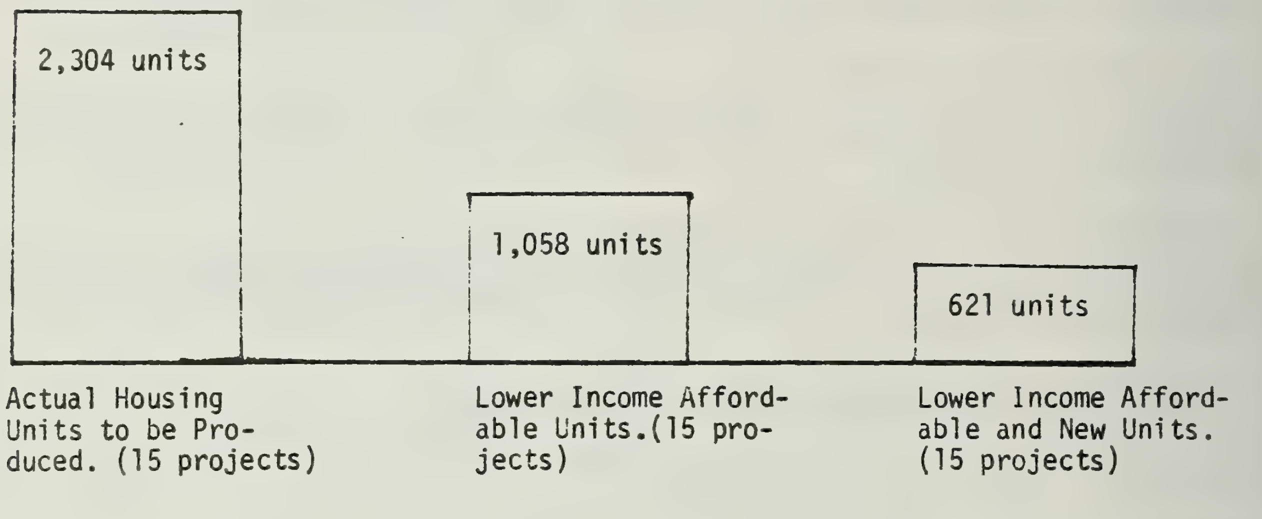
Based upon a scientific analysis of housing need, the OHPP assumed that all units produced would be newly available and affordable.

Chart 3 contrasts the 2,304 housing units to be produced by the first 15 approved OHPP development packages (which meets only about 50% of the need identified for those projects) with the actual type of the housing to be produced.

Less than half of these, 1058 units, prove to be lower income affordable. That is defined by the U.S. Department of Housing and Urban Development as being no more than 80% of the Standard Metropolitan Statistical Area's median family income (or in practice no more than $22,750 a year for a family of three, $17,700 per year for a single individual). To arrive at that figure, the SFIC eliminated as not low or moderate income affordable 279 units of luxury housing (Trammel-Crows $3 million condos), 282 units of law student accomodations and 685 moderate units as part of the City Affordable Housing bond program (loans for single family purchase) since these will impact mostly on high moderate income types (3 person families earning up to $34,000 per year).

Most importantly, only 621 units are both lower income affordable and constitute actual new additions to the housing stock. This includes "gap" financing provided to four different elderly, federally subsidized projects and the 300 family cooperatives (Northridge) developed by Catholic Social Services in Bayview-Hunters Point. The SFIC eliminated the rehabilitation of public housing units from this total since many of those where known to be already occupied and the amount of subsidy indicates only minor rehab can be carried out.

Chart 3 - OHPP Impact on New & Affordable Housing Needs



So, the cumulative impact of all of the OHPP shortcommings has been to so impair the program's workability that of the actual units to be produced only 15% meet the objectives of the program.

The City's annual Community Development and Housing Assistance Plan estimates that there are 66,361 households having a housing assistance need. After nearly four years, the OHPP's total production, available to those lower income households, comes to less than 1% of total need.

The OHPP is not in fact considered as part of the Housing Assistance Plan. That might explain why it has had little bearing upon priority housing needs. The HAP determined that of the households having a housing need, 75.1% were families and 24.9% elderly persons. Yet the OHPP has delivered just about the opposite quantity of its affordable units to the elderly (70.3%) while ignoring families.

The case of the Pink Palace is demonstrative of those priorities. This run down public housing project (Yerba Buena Plaza Annex) had 211 family units. But the media and the Mayor's Office considered it the locus of the area's high crime rate. Instead of rehabing the structure for continued low income family use, OHPP funds were used to convert it to senior housing with a net loss of 13 units (down to 198). No one bothered to explain how frail seniors would deal with the area's continued high crime rate; but Preston Cook, the Mayor's Housing Authority President, explained City policy for poor families - according to Cook poor families would simply have "to go somewhere else."

B. A Redirection of Priorities is Required

In order to meet the priority need, the OHPP must require that all units produced be in accord with its original mandate - be newly available and low and moderate income affordable (as defined by H.U.D.).

To guarantee that the OHPP is consistent with and complements the rest of the City's housing assistance programs, it should be incorporated into the HAP and be operated by a City housing experienced entity (OHED).

RECOMMENDATIONS FOR CORRECTIVE ACTION

The OHPP has neither met its stated objectives nor realized its unique potential to contribute scarce resources for the development of affordable housing.

The program's deficiencies are not ones of concept or workability. They are attributable to program design flaws and mismanagement. The OHPP spells out far too few guidelines and assigns far too much authority to the DCP. Major loopholes act to defeat the very purpose of the program.

This critique recommends the following corrective action:

1. The OHPP should become a freestanding Ordinance. The legislative intent must clearly be to require newly available and lower income affordable housing to be produced in the precise quantities necessitated by office generated demand.
2. Income limits should be in accord with the upper limits established by H.U.D. for moderate income persons.
3. DCP's role should be limited to permit, EIR and OHPP review.
4. The credit system should be eliminated.
5. Negotiated deals will be eliminated to be replaced by developer options to either a) pay a $12,[illegible]00 fee into a City housing finance pool or b) undertake to directly develop the required housing.
6. The OHED should operate the affordable housing development pool and monitor developer compliance when they undertake direct production. Certification of payment or production would be forwarded to DCP. The City should match developer OHPP contributions to the pool to increase finance impact and leverage capability.
7. Final OHPP housing approvals must be subject to a public hearing and be approved by a vote of the CPC.
8. The OHPP should be incorporated into the HAP and be operated in accord with projected lower income household needs.

OHPP HOUSING OBLIGATIONS & COMMITMENTS

Developer and Project	Housing Obligation	Credits Awarded	Actual Units Projected	Gross Contribution
Walter Shorenstein - Five Fremont	550	564	282	-0-
" " - 123 Mission	307			
Westlake - 901 Montgomery	56			
353 Assoc. - 353 Sacramento	212	212	450	$1,014,000 shar
Citicorp - One Sansome	512	512	625	3,072,000
Trinity - 1145 Market	96			
Perini - 25 Jessie	89			
Amalgamated Mgt - 185 Berry	150			
Lincoln Prop - 101 Mission	180	180	60	500,000
" " - 33 New Montgomery	189			
Vintage Prop. - 160 Spear	250	250	228	-0-
International Land - 455 Market	130			
Lawrence Lau - 555 Montgomery	155	155	share Citicorp	933,000
Amerisport - 1155 Market	115			
Gerald Hines - 580 California	230	293	share Citicorp	882,000
			73	583,000
Norland Prop. - 345 California	532	408	share 353 Assoc/	share 353 Asso
			85	500,000
" " - 135 Main	231			
Cahill Const. - 101 Montgomery	211	610	(13)*	2,440,000
Campeau Corp - 333 Bush	452			
Trammel Crwo - Washington/Mont.	210	65	33	on site
		164	82	410,000
Harper Group - 252 Townsend	54			
Deringer Dev - 1660 Mission	152			
Marathon - 2nd and Folsom	618	707	300	3,500,000
Southern Pacific - 201 Spear	233			
Honorway Invest. - 388 Market	84			
Frank Alioto - 250 Pine	86			
Firehouse II/Tai - 466 Bush	79	36	18	on site
SF Federal - SF Federal Bldg.	155	155	81	621,000
Highfield Corp - 71 Stevenson	298	share Cahill	same	same
" " - 90 New Montgomery	110	" "	"	"
Braerer Holdings - 600 Harrison	202			
Totals	6,928	4,311	2,304	$14,460,000
Less extra credits		175		
		4,136		

*211 family units converted into 198 senior units for net loss of 13 overall.

IUN 4 1984 to DCP

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June 4, 1984

Office of Environmental Review
Department of City Planning
450 McAllister Street
San Francisco CA 94102

COMMENTS ON DOWNTOWN PLAN EIR

1. At the hearing before the Commission I indicated that there was insufficient information on impediments to traffic flow during rush hours due to accidents, spills, construction problems etc. Readily available should be the American Automobile Assn. reports that are made at least during rush hours to local radio stations. They note such information as chemical spills on the Nimitz requiring rerouting of traffic, the amount of time delay at the Bay Bridge toll plaza, etc. As a similar constraint on traffic you must take into account traffic generated on the regional freeway system by development occurring in other counties, especially in eastern Contra Costa. Please factor in those projects into the transportation analysis. Finally, am rush hours are just as important as pm hours for traffic coming into the city. Please explain in detail the length of the rush hour and the current conditions on the regional freeway system. **E.1.3** **E.1.4.2** **E.3.1**

2. The Downtown Plan EIR rises or falls on the sufficiency of the information in the base document, Downtown Transit Improvement Program, Working Paper I, Projection of Long-Range Transportation Demand, May 1982. That document makes economic projections as to office development over the next 20 years. **B.1.1** **B.1.4.2** **B.1.2** **E.2.2.2**

   a) Please explain in detail the qualifications of Chi-Hsin in making economic projections. **E.1.1.2**

   b) If Shao is not himself an economist, please explain the testing of his methodology by reputable economists. **E.1.1.2**

   c) Use of Standard Industrial Claiifications is questionable. For example, how do you explain the dramatic increase between 1977 and 1978 in "mining" - from 1,420 to 33,283 in San Francisco. Is that not an example of how vulnerable, rather than reliable, that data is. Similarly how do you explain the astounding number of

B.1.1

manufacturing workers -- 52,084 -- at a time when the DCP claims that such jobs are virtually non-existent in San Francisco? **B.1.4.2** **B.1.4.3** **E.1.1.2**

d) What other jurisdictions follow the methodology used in this report to make projections of increase in commercial office space? What other EIRs of consequence have used this methodology outside of San Francisco? **B.1**

E.1.2

e) How can you justify the assumption that "San Francisco will grow at the same rate as it has without relation to the growth patterns of the Region?" **B.1**

B.2.1

f) San Francisco has been going through a building boom in the past several years. Why are 20-year patterns more correct than a constantly revised 5-year pattern? For example, many regional planning agencies constantly do 5-year plans, updating and dropping the oldest year and adding a new one, for each plan. As a result weird one year variations are evened out in each 5-year plan, while at the same time trends are more easily picked up. Revise the projections based on 5-year data through 1983, the year for which you should have the most accurate data. **B.1**

g) If this methodology is correct, please test it for other periods. 1920 - 1939 to project 1940 - 1959, 1930 - 1949 to project 1950 - 1969, 1935 - 1954 to project 1955 - 1974, 1940 - 1959 to project 1960 - 1979. Do the numbers still work?

B.1.3 E.1.1.1 E.1.2

h) In general the economic projection model seems extraordinarily simplistic. Please explain why much more subtle factoring did not occur. This approach reminds me of the "gold bugs". Why not simply make projections based on any other single factor, such as interest rates, an index of instability of foreign economies, etc.? **B.1.1**

B.1.2

i) There is no explanation of the component of the SIC categories. Is Standard Oil all lumped together under "mining" in Appendix B? Do you contend that there were 34,000 MINERS in San Francisco in 1979, or were they OFFICE WORKERS.

B.1.4.2

j) Omitted from this simplistic formula is any accounting for the role of flight capital in the San Francisco economy. Please explain the role of Canadian and Texas money in high-rise office construction in the past 5 years. Also, the number of buildings which are financed through off-shore partnerships, joint ventures, corporations, as well as money that appears to be coming here from Hong Kong and other areas with unstable economies. Do these developers have the same bottom line on investment, i.e. expect same rate of return on investment, or are there other factors involved, such as just getting their money out of a shaky economy and invested somewhere else. **B.1.4.2** **B.1.4.4**

3. You have incorporated by reference, as near as I can tell, virutally all of the Downtown EIR Consultant's Report, especially the appendices.

a) Please transcribe all comments on all "hearings", whether formally hearings or not, going back all the way to the Scoping. Please provide answers to all comments. I am hereby incorporating by reference all comments, whether written or oral, on the Downtown EIR. **S.1.2**

b) When the Downtown EIR was presented last year, SFRG attempted to get copies of related studies that were done as part of that report, but were told that they were confidential and would not be released to the public. In particular that includes a study done on increased land values by lot-by-lot surveys, to figure the profit margin when new office construction occurs. You must now release any and all studies done in conjunction with the Downtown EIR, since you are attempting to grandfather that data and conclusions into this document. Please make all documents, all correspondence between the Department, the consultants and the sponsor of the Downtown EIR, as well as all drafts and minutes, available to the public. Please contact me about reviewing them at your office. **B.1.4.10** **S.1.1**

4. Both the Downtown EIR and the Downtown Plan EIR rely on projections of 1984 traffic, transit, etc. rather than doing surveys of the actual conditions in 1984, or in 1983 when this EIR was prepared. Has any of this been tested to see how accurate the projections were. **B.1.4.1** **E.1.2**

5. The MUNI has not done an actual count of riders for about 5 years. How do you know the data you use for MUNI in any way approaches reality? **E.2.2**

6. Buildings listed as on line in 1984 are not actually open at this time, or will not be fully occupied. Does your 1984 data factor in that reality. For example, 160 Spear will open about early 1985. It is in your list. **B.1.1**

7. The list of projects and when they came on line is not totally helpful. What factor did you use to put a building into a certain year? initial temporary permit of occupancy, full rental, final certificate of occupancy? For each of the buildings listed since 1965, please provide information on when

the building was approved by the City, to enable a projection of when buildings already approved, but not on the list, will be coming on line. How many square feet have been approved since your list (which includes buildings on line in 1984) was prepared? Please add in Olympia & York, all redevelopment projects currently under construction or for which exclusive negotiating rights have been granted. The total is a substantial amount of the TOTAL amount you have projected to 1999. If the buildings already approved, adding those under environmental review, all proceed, and construction proceeds within the usual 3-year period, how much development will be left to occur before the end of the century, given your methodlogy. ARE YOU PROJECTING A DEPRESSION IN SAN FRANCISCO? HOW ELSE CAN YOU ACCOUNT FOR THE DRAMATIC DROPOFF IN CONSTRUCTION? Does the development community and the construction industry agree with this projection? Why is a boom and bust cycle healthy for San Francisco? Why would it not be more reasonable to spread out development over a longer period, if it is needed at all and the City is able to accommodate the new workers, so that there is an evening out of demand of construction workers, construction goods and stresses on the City? **B.1.1**

8. You have already received from SFRG copies of our critiques on the Downtown Plan (yellow cover) and the Downtown Plan EIR (tan cover). Please consider them comments on the DTP EIR. **S.1.2**

9. I have already submitted to the OER the acid rain study done by UC Berkeley, Institute of Governmental Studies, Public Affairs Report, 12/82 no. 6 - Acid Rain and Ecological Damage: Implications of Sierra Nevada Lake Studies. Please factor into the cumulative air quality analysis the problems outlined in that study, i.e. the pushing eastward of bay area air problems into the fragile Sierra ecology. **I.6**

You have much more extensive comments submitted separately by other SFRG members.

Sincerely,

Sue C Hestor

Sue C. Hestor

p.s. My afternoon Examiner has an explanation of a commute from STOCKTON as the Phantom Commuter. Your explanation of traffic, housing, etc. needs to take into account the increasing radius workers in SF use to look for affordable housing as near-in locations don't provide it. This affects traffic, transit, air quality and housing demand, not to mention agricultural/housing competition for cheaper land. Additionally, it threatens recreational open space areas.

B.6
D.3.2.4
E.2 E.3
I.1

SM RECEIVED

JUN 4 1984

CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

Tony Kilroy
473 11th Avenue
San Francisco, Ca. 94118
June 1 1984

Planning Commission
450 McAllister Street
San Francisco, Ca. 94102

Comments on the Draft EIR for the Downtown Plan

WHY DOES'NT THE DEIR ADDRESS THE EFFECTS OF DEVELOPMENT AND VEHICLE EMMISSIONS ON PEOPLE WITH PULMONARY DISEASE?

There are millions of Californians who suffer from Pulmomary Disease. There are 35 million Americans with Asthma. Assuming 10% of the population lives in California then there are more than 3 million asthmatics in California.

The DEIR does not address the effect of vehicle emmissions on pedestrians and people in the area of traffic congestion and gridlock. It should and must since people with asthma or other Pulmonary Disease often find themselves in a life threatning situation if breathing becomes difficult because of irritants in the air they are forced to breath.

It is inadequate to pass the the BUCK and answer that this is the responsible of the local Air Quality Board. It is also the **I.2**
responsibility of the local government to provide a clean and safe environment for its people.

WHY DOES'NT THE DEIR RECOMMEND AN ANNUAL LIMIT ON THE AMOUNT OF OFFICES THAT CAN BE BUILT IN SAN FRANCISCO?

The analysis of the problems associated with office construction over the last decade has addressed a limit on the amount of **P.1**
offices that should be permitted. Why is'nt a limit recommended as a mitigation measure?

WHY DOES'NT THE DEIR ADDRESS THE EFFECTS OF OFFICE CONSTRUCTION ON THE CAPACITY OF MUNI RAILWAY VEHICLES?

The criteria for Muni bus capacity is 48 passengers seated and 24 standing. This is the maximum capacity of a bus according to the method of analysis used in the DEIR. I have riden the 38 line for 20 years and can testify that the 38 bus is often losded with 55 to 60 people standing -- this is a more than a 250% increase above the criteria used in the DEIR. The DEIR should state how the City plans to reduce this tremendous crowding and overloading of public transit. I can provide data on the actual vehicles -- date, time, vehicle number, number of passengers at certain points -- if the DCP or MUNI wishes to check or question my survey figures. **E.2.2** **E.2.2.1** **E.6.2.1**

WHY DOES'NT THE PLAN AND DEIR PROVIDE FOR A RECOMMENDATION FOR RECREATIONAL FACILITIES IN NEW OFFICE BUILDINGS?

A few have provided recreational and exercise facilities. The PLAN should contain a requirement that all new offices contain such amenities without given any bonus to the developer. **B.6**

WHY DOES'NT THE DEIR ANALYSE THE POSSIBILITY OF TOXIC WASTES BEING FOUND DURING CONSTRUVTION?

Many of the old industries used chemicals -- paint manufacturers and others -- in the South of Market area. The DEIR shold address this and the possibility that toxic wastes exist and have to be considered as a potential hazard in the future. **L**

Tony Kilroy

HERITAGE

THE FOUNDATION FOR SAN FRANCISCO'S ARCHITECTURAL HERITAGE

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DEPT. OF CITY PLANNING

June 1, 1984

Dean Macris, Director
Department of City Planning
450 McAllister Street
San Francisco, CA 94102

RE: EE81.3.

Dear Mr. Macris,

Enclosed for your consideration are Heritage's comments on the DEIR for the Downtown Plan. **Z.1**

With the exceptions mentioned below and explained in the attachments, Heritage agrees with and supports the DEIR and its findings. However, we have only evaluated those parts of the DEIR that pertain to the Preservation Chapter of the Plan, and other controls that might impact upon architecturally or historically significant buildings or their environment. **Z.1**

We commend the staff and consultants involved in the preparation of this report, which is probably a landmark in the planning and environmental professions for its thorough assessment of a very complex plan for a large area of the City. **S.2** **Z.1**

Please incorporate our oral comments on the DEIR of April 26th, and our letters to the Department dated January 10 and April 25, 1984 on the Downtown Plan and Planning Code Changes, with these comments. **S.1.2**

1. The major lessons of the DEIR for preservation of the City's architectural heritage are that:

    a. Less than one third (1/3) of all buildings with architectural or historical significance rated by Heritage (A, B, or C) are encouraged to be protected by the Plan. Only one fifth (1/5) are required to be preserved. **C.1.1**

    b. There will be no reduction in the rate of demolition of such buildings, as a result of the Plan, only a shift of the threat from the most significant buildings to the contributory buildings. **C.1.1**

    c. The supply and demand relationships for TDR show that the TDR incentive alone is unlikely to preserve contributory buildings. Stronger controls over demolition of Category III and IV buildings are needed to preserve the character of Conservation Districts and these structures. **C.1.1**

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d. The implementation measures of the Downtown Plan are insufficient to carry out the plan objectives for Conservation Districts and the goals to balance economic growth with preservation of the past character of the Downtown. For example:

> Plan objective (p. 65): "Past development, as represented by both significant buildings and by areas of established character, must be preserved. The value of these buildings and areas, becomes increasingly apparent as more and more other buildings are lost," and **C.1.1**
>
> p. 74 Conservation Districts: "Buildings of somewhat lesser quality than those required to be retained take on an increased importance. These buildings help create a setting that reinforces and compliments the qualities of the more significant areas, and their own attributes are more apparent and appreciated." **C.1.1**

2. Problems of the Proposed Plan TDR Policies, identified by the DEIR:

The proposed Transfer of Development rights provisions of the Downtown Plan and Planning Code are very important to the success of the Plan's preservation element. However, the purpose of the TDR is to help in preserving significant and contributory buildings. It is not necessary to compensate owners for reduced zoning potential or restrictions on architectural resources. The DEIR demonstrates that TDR alone will not preserve contributory buildings, because of the following problems:

a. The supply of TDR from subarea 1, 6, and 2 are too large to be absorbed within each subarea and the special development district. Prices for TDR in 1 and 6 are likely to be too low to cause preservation. **C.1.1**

b. The sellers of TDR from other subarea (C-3-G/C-3-S) will have an unfair windfall by being able to sell in Special Development District. **C.1.1 C.2.1**

c. Contributory buildings are unlikely to be preserved by the TDR incentive unless the existing structure occupies most of the available FAR, or unless the Planning Commission retains the discretion to deny demolition of such buildings on a case-by-case basis. **C.1.1 C.1.2**

3. Limits of and Inaccuracies in the DEIR Analysis:

We believe that the methods of analysis and assumptions used by the DEIR consultants have seriously underestimated the number of contributory buildings that will be demolished as a result of the permissive policies in the Downton Plan. **C.1.2**

a. The consultant's and staff's assumptions are not provided in the DEIR, and they should be. However, in conferring with the consultants we have learned that buildings occupying more than 2/3 of their allowable zoning and sites less than 10,000 square feet in size were not considered as "opportunity sites", where the structures would be considered threatened. We also learned that in Conservation Districts the lowered height limits were assumed to remove structures from the threat of demolition." Numerous examples exist throughout the downtown that invalidate these assumptions as dependable rules for estimating numbers of buildings that are likely to be demolished. A more dependable analytical process is necessary to obtain more accurate estimates.

- o Buildings occuping more than 2/3 of the allowable FAR on the Downtown have been the subject of some of the most bitterly contested development-preservation disputes, including the City of Paris, the Fitzhugh Building, the California Pacific Building, and others. **C.1.2**

- o Numerous building sites of less than 10,000 square feet have been highly sought by developers and are now built or in final stages of approval, including:

  - Washington/Battery Building - 4656 sq. ft.
  - 466 Bush Street - 5675 sq. ft.
  - Proposal next to Notre Dame des Victoires in 500 block of Bush Street - 1911 sq. ft. **C.1.2**

- o Several buildings in some of the most restrictive height limit areas of Conservation Districts could more than double their buildable floor area by demolishing existing contributory structures, including most of the structures in the Front Street Conservation District. **C.1.2**

b. Several different estimates of the number of architectural resources expected to be demolished under the Downtown Plan are given Estimates of the Summary, (I-H-1), the Impact Section (IV-14-25), and the TDR effects discussion (IV-B-71) are inconsistent with other estimates. (See estimates attached). **C.1.2 C.3.1**

4. The DEIR demonstrates that improvements in the Downtown Plan implementing measures are needed for effective preservation:

Alternatives should be described in the EIR that would adjust provisions of the Plan and ordinance to preserve contributory buildings, and improve the TDR system, as discussed below:

a. The Planning Commission should retain conditional use authority to approve or deny demolition of contributory buildings (category III and IV) on a case-by case basis. **C.2.2**

b. TDR transfers should be limited to within the same zoning districts except for transfers from C.3.0 and C.3.R, which should be permitted to C.3.0 (SD). Transfers from C.3.G and C.3.S should not be permitted to C.3.0 (SD). This change would help the market for TDR's from C.3.0 and C.3.R districts. **C.2.1 Y.1**

c. The gross floor area of existing significant and contributory buildings in C.3.0 and C.3.R districts should be calculated in the same manner as new buildings under Code Sections 102.8 and 102.10 through 102.15, for TDR purposes. For example, additional FAR should be tranferable from existing buildings if the ground floors of such buildings are devoted to convenience retail. **H.4.2**

d. The existing space in significant or contributory buildings devoted to cultural, educational or recreational uses available to the general public (as in Code Section 102.8 (b)(15)) should be excluded from TDR transfer calculations from such sites, especially for churches and other non-profit owned buildings. Additional TDR from such sites will compensate for rehabilitation tax-benefits unavailable to tax exempt organizations. **H.4.2**

e. The base allowable FAR in C-3-G, C-3-S and C.3.0(SD) districts should be reduced by the same general proportion that base FARs in C-3-O and C-3-R have been reduced (28 to 40%). We recommend that the base FAR in C-3-G should be 6:1 (40% reduction) and base FAR in C-3-S should be 5:1 (28% reduction), and base FAR in C.3.0(SD) should be 5:1 (28% reduction). **H.4.2**

District	Basic FAR	% Reduction From Existing
C-3-O	10:1	28.6
C-3-R	6:1	40
C-3-G	6:1	40
C-3-S	5:1	28.6
C-3-O(SD)	5:1	28.6

H.4.2

These reductions would substantially reduce the supply of TDR available to the SD District by about million square feet, help maintain a reasonable price for TDRs in all subareas, and would treat all property owners in the downtown zoning districts equally. **C.2.1**

We hope you will give serious consideration to making these changes in the Plan and ordinance to preserve the character of Downtown San Francisco, and the availability of the TDR system. **S.1.1**

Sincerely yours,

H. Grant Dehart, AIA, AICP
Executive Director

cc: George Williams
Toby Rosenblatt
Planning Commissioners
Heritage PPC
Alec Bash

cvr

SUMMARY OF ESTIMATES FOR BUILDING DEMOLITION
DOWNTOWN PLAN EIR

I. Existing Buildings (Table IV-H-3)

1. Heritage and Landmarks

	Subarea 1	Subarea 2-7	Total	Summary
Heritage A	47	83	130	
Heritage B	84	212	296	
Heritage C	188	775	963	
National Register or City Landmarks	17	14	31	
TOTAL	336	1084	1420	1420

2. Downtown Plan

	Total	Summary
Category I	229	
Category II	37	
Subtotal significant	226	
Category III	22	
Category IV	197	
Subtotal contributory	219	
TOTAL DEPARTMENT OF CITY PLANNING	485	485
% of Heritage	34.1%	

C.3.1

II. Estimates of Demolition - DEIR

1. Summary (I-H-1)

	Categories I-IV		
1984-1990 --	Significant and Contributory Buildings:	43	
1990-2000 --	Significant and Contributory Buildings:	41	
	TOTAL		84

2. Impacts (IV-H 25-29)

	Subarea 1	Subarea 2-7	Total	Summary
1984-1990	43	7	50	
Category I	1	--	1	
Category II	0	--	0	
Category III	0	--	0	
Category IV	4	--	4	
Subtotal	5	--	5	
1990-2000	15	24	39	
Category I			0	
Category II			1	
Category III			3	
Category IV			4	
TOTAL THREATENED (A,B,C)				89
TOTAL CATEGORY I-IV				13

3. TDR supply/demand effects (IV-B 71-72)

Likely to be retained:

o Sites with few or no TDRs 40% of contributory buildings (.40 x 266):	106
o Buildings least likely to be retained 10-15% of contributory buildings (.10-15 x 266):	27-40
o Remaining buildings (some would be demolished) 35-50% of contributory buildings:	93-133
If it is assumed that 1/2 would be demolished:	47-67
TOTAL CONTRIBUTORY ASSUMED TO BE DEMOLISHED, (Category III and IV):	74-107

C.1.2

SPECIFIC COMMENTS ON DOWNTOWN: EIR

I. Summary

I.H. The Summary of Architectural Resources to be demolished does not agree with the impacts Section IV H-25 or the TDR description. All estimates are low because the assumptions for "opportunity sites" are invalid. **C.1.2 C.3.1**

Alternatives are incomplete. The EIR should describe sub-alternatives or variations on the Downtown Plan, e.g. preservation of all "A" and "B" rated structures and "C" rated structures in conservation districts, controls for Conservation Districts covering all National Register eligible Historic Districts (see Splendid Survivors); and Planning Commission conditional use review of demolition of contributory structures. **C.2.2**

IV. Environmental Setting and Impacts:

Figure III.2, (p. III.13)

The Height and Bulk Districts proposed by the Downtown Plan and deliniated in the DEIR appears to be different than those being used by the Planning Department in project reviews. The 665 Bush Street proposal has been claimed to be in a 240 foot height limit zone and outside of the Conservation District and the Department staff have reported that 130 feet will be the allowable height for the 212 Stockton Project. If the DEIR has inaccurately reported the height and bulk districts it will lead to misleading and inaccurate public responses to the Downtown Plan and DEIR. **H.4.1**

Chart A and B (P. III.14) The height and bulk limits proposed by The Plan should remain in effect as described in the DEIR. Modifications to these controls in response to proposals from the business community for 20% height-tapering increases and increases of floor area size and diagonal dimensions should be avoided. Adverse public reaction to very large buildings south of Market will jeopardise the acceptability of the TDR system and therefore threaten the Preservation Policies of the Plan. **H.4.1**

IV.B.37, Paragraph 1 claims that the Plan's policies are effective in preserving the existing scale, character and significant buildings, and therefore small buildings with the most remaining development potential. Due to limited authority to deny demolition, this statement would not be true for contributory buildings north of Market in sub-areas 1 and 6, or the character of areas with large groupings of such buildings. For example, virtually all of the Front Street Conservation District is likely to be demolished and replaced by 75' high buildings. **C.1.1**

IV.B.39, Paragraph 1 says "it will take time for owners of historic buildings to evaluate the effect and permance of the preservation policies in deciding whether to sell TDRs." While this is probably true, it indicates that the supply of TDR to the market may be controlled rather than a "flood on the market," but it also means that the threat to significant and contributory buildings will remain even if the Plan is enacted. **C.1.1**

IV.B.59-60: The discussion of spill-over effects of the Downtown Plan should indicate that many architectural resources in these spill-over areas will be threatened by Downtown Plan policies, and protection policies need to be incorporated into future sub-area plans. **C.1.1**

IV.B.65: Transferable Development Rights. The statement "At any particular time the demand for and supply of TDR would be in 'balance'" should be clarified. This does not mean that sellers of TDR will have the incentive to retain contributory buildings if not required to, in all sub-areas, because some owners would receive less value for TDR than for site redevelopment, especially in sub-area 1. **C.1.1**

-- 60-65% of TDR would come from significant buildings
-- 4-5% from open space sites; and
-- 30-35% from contributory buildings (including non-rated buildings in Conservation Districts 3, 4 and 5). This compares to the following distribution of buildings in the C-3 zoning districts.

Category I and II -- significant (266), or	55%
Category II and IV -- contributory (219), or	45%
"A" rated buildings -- 130, or	9.3%
"B" rated buildings -- 296, or	21.2%
Total "A" and "B" -- 426, or	30.5%
"C" rated buildings -- 963, or	69.2%
Other city-rated -- 4, or	.3%
Total 1,393 buildings	100%

C.1.1

If Category III and IV buildings or "C' rated buildings are generally distributed equally, and of the same size as more significant buildings, the TDR supply percentages might imply that significant buildings are supplying a disproportionate amount of TDR because their owners have no choice (per Sanger findings). It might also bear out the finding that a large percentage of contributory buildings would be demolished rather than transferring unused development rights. **C.1.1**

IV.B.67: "The comparisions of supply and demand indicate that overall demand alone is unlikely to be strong enough relative to supply to create strong incentives for preserving contributory buildings, the retention of which is not required." This is a key finding supporting the need for other alternatives than those discussed in the DEIR. The Department should:

-- Require preservation of contributory buildings on a case by case basis or as with significant buildings. **C.2.2**

-- Decrease the supply of TDR through further reductions in base FARs. (This would also serve to reduce other impacts of the Plan, e.g., transit, sunlight, housing, etc.) **C.2.2 H.4.1 Y.1**

-- Restrict TDR transfers to sub-area 2 only from sub-areas 1, 2 and 6. **C.2.1 Y.1**

-- Reduce height and bulk limits in all sub-areas except 2 to reduce the gap between allowable development on sites of contributory buildings and space in existing buildings. **C.2.1 H.4.1 Y.1**

IV.B.69: Since "Builders of projects in sub-area 1 could afford to pay the highest prices to purchase TDR," (IV.B.69 para .3) unclassified "C" rated buildings, in the 300 block of Pine STreet, on buildable sites are likely to all be demolished. If owners of contributory buildings are permitted to demolish contributory buildings in advance of building proposals (removing the cause, cited in Section 128 (c)(1)), these buildings will be able to receive substantial increased density through TDR and will be demolished. This block of Pine should be in a Conservation District. **C.2.1**

IV.B.71: The most likely contributory buildings to be retained are those with few or no TDR to sell (roughly 40% according to the DEIR). However, considering the per square foot rent difference (about $14/sq. ft.) between new and old buildings in sub-area 1, the higher market demand for north of Market sites for corporate image and the desire for more efficient buildings, even buildings utilizing close to their available FAR are vulnerable to demolition. (Examples: Niemen-Marcus, Fitzhugh) **C.1.2**

IV.B.75: The statement that the "TDR program would provide a means of compensating the owners of significant buildings for the required retention of their property" should be removed. TDR's as compensation for regulations and FAR reductions is not legally required, they are only a planning tool for shifting development and preserving buildings. **C.3.2**

IV.H.25: Projects losses of 50 resource buildings ("A", "B" and "C") in the C-3 districts by 1990, and an additional 39 or 89 by 2000 is very close to the summary amounts (p. I-H.1) for expected losses of significant or contributory buildings, or 84 buildings. This would mean that only five unclassified contributory buildings outside of the Conservation Districts (of the total 908 such buildings (1393 - 485)), would be demolished before 2000. This small number is unrealistic and challenges the credibility of the above estimates. These figures do not agree with the summary, or the discussion of the TDR in prior sections of the report. **C.1.2 C.3.1**

Table IV.H.3: This clearly indicates that most buildings to be lost before 1990 will be in sub-area 1, due to weak policies controlling demolition of contributory buildings. Between 1990 and 2000 the highest number of demolitions is also in sub-area 1, but other sub-areas combined have a higher total. These estimates are too low, because the assumptions used for identifying "opportunity sites" are invalid. **C.1.2 C.3.1**

IV.H.29: "The greatest numbers of vulnerable architectural/historical resources would be concentrated in the downtown office district." This finding should justify more direct demolition controls to save the remaining architectural fabric of the north of Market area, consistent with the intent of the Downtown Plan. **A.1**

V.13.6: Other ways to reduce supply and increase demand for TDR should be discussed, such as limiting transfers from G.3.G, and C.3.S and reducing base FAR's in C.3.G, C.3.S to 6:1, and 5:1 and in C.3.O(SD) to 5:1. **C.2.1 H.4.2 Y.1**

These mitigation measures should be adopted in the revised Plan and Ordinance. **S.1.2 Z.1**

Mitigation measures to preserve contributing buildings should be discussed, including retention of conditional use review by the Planning Commission to deny demolition, based on tests for the replacement structures as identified in Heritage's Preservation Stratey for Downtown San Francisco. (Sanger) **C.2.2**

VII Alternatives:

Other sub-alternatives to the Downtown Plan should be discussed, such as those identified in the cover letter and Heritage's prior correspondence of January 10 and April 25, 1984. **C.2.3**

A sub-alternative to the Preservation policies should review the effect of strengthening Planning Code Article 10 and making the Landmarks Preservation Advisory Board a stronger regulatory agency, with its own professional staff. **C.2.3**

HERITAGE

THE FOUNDATION FOR SAN FRANCISCO'S ARCHITECTURAL HERITAGE

April 25, 1984

George Williams
Department of City Planning
450 McAllister
San Francisco, CA 94102

Dear George:

Enclosed are Heritage's comments on the draft ordinance changes to implement the Downtown Plan. These comments were reviewed by our Preservation Policy Committee and Law Committee on April 18. **Z.1**

Our comments also reflect our concerns about and recommendations for changes in the Plan, especially in light of the Downtown EIR information on the continuing threat to the contributory buildings and the supply and demand imbalance between subareas 1 and 6, and subarea 2. **S.1.2**

In general, we think the ordinance is very well drafted and is responsive to the concerns about the Downtown Plan, and the process for reviewing alterations to significant and contributory buildings, communicated in earlier correspondence. **S.1.2**

In addition to our comments on the ordinance, we recommend for your consideration the attached comments by Nancy Shanahan, Attorney for the National Trust for Historic Preservation. While there may be some redundancy, we have sought to avoid comments on points that Nancy has made very clearly. **H.1**

Our primary problem with the current draft of the ordinance is a substantive difference in policy over the preservation of contributory buildings in Conservation Districts (Category IV), and other contributory buildings (Category III) outside of Conservation Districts. **C.1.1**

The DEIR on the Plan clearly documents that these structures will not be preserved by the TDR incentives alone. Unless more contributory buildings are preserved by the Planning Commission through retaining discretion to deny demolition, the historic character and older architectural fabric of the Conservation Districts and much of the downtown will be lost. While the scale and quality of new architecture within these areas might be controlled, the loss of 43 buildings before 1990 and an additional 40 buildings by the year 2000 will represent an irreplaceable loss of the character of the Conservation Districts. This result would be contrary to the policies

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expressed in the Downtown Plan and the implementing ordinances. **C.1.1 C.1.2**

In order to assure that the preservation purposes of the Plan are carried out in a more equitable manner, we recommend the following key changes to the Plan and ordinances: **S.1 Z.1**

1. The Planning Commission should retain conditional use authority to approve or deny demolition of contributory buildings (Category III and IV) on a case-by-case basis. **C.2.2**

2. TDR transfers should be limited to within the same zoning districts except for transfers from C-3-O and C-3-R, which should be permitted to C-3-O(SD), e.g., transfers from C-3-G and C-3-S should not be permitted to C-3-O(SD). This change would help prevent the market for TDRs to be used in C-3-O(SD) from being flooded with lower priced development rights, and would help preserve the value of significant and contributory building sites in C-3-O and C-3-R districts. **C.2.1 H.4 Y.1**

3. The gross floor area of existing significant and contributory buildings in C-3-O and C-3-R districts should be calculated in the same manner as new buildings under sections 102.8 and 102.10 through 102.15, for TDR purposes (i.e., additional FAR should be transferable from these sites if ground floor areas are devoted to convenience retail). **H.4.2**

4. The base allowable FAR in C-3-G and C-3-S districts should be reduced by the same general proportion that base FARs in C-3-O and C-3-R have been reduced (28 to 40%). We recommend that the base FAR in C-3-G should be 6:1 (40% reduction) and base FAR in C-3-S should be 5:1 (28% reduction). **C.2.1 H.4.2 Y.1**

These reductions would substantially reduce the supply of available TDR, help maintain a reasonable price for TDRs in all subareas, and would treat all property owners in the downtown zoning districts equally. The current proposal treats some property owners unevenly from district to district, giving C-3-G and C-3-S owners an unfair advantage because of lower reduction of their development potential, and a higher value for their TDR (because they can be sold in the higher value C-3-O(SD) district). **C.2.1 Y.1**

Based on your consultant's estimates of available TDR from the C-3-G and C-3-S use districts (3.84 mil. sq. ft.), our recommended reduction in base FARs in these districts could reduce the supply of available TDR by about 1 million square feet, or about 9% of the total 11.2 million square feet from all subareas. **C.2.1**

When combined with recommendation (3) above, such an adjustment in the supply-demand relationship for TDRs in subareas should make the preservation and TDR policies of the Downtown Plan more effective and equitable. **C.2.1 S.1.2 Y.1**

We enclose other detailed comments on the proposed ordinance.

We commend you and your legal consultants for an excellent job of drafting the proposed ordinance. We hope you and the Planning Commission will give serious consideration to our comments for further improving the Plan and ordinance. **S.1.2 Z.1**

Sincerely yours,

H. Grant Dehart, AIA, AICP
Executive Director

lc

cc: Dean Macris
Toby Rosenblatt
Planning Commissioners
Marc Mihaly
Roger Boyer
Linda Recht, Recht Hausrath
Heritage Preservation Policy Committee
Heritage Law Committee

SPECIFIC COMMENTS -- DOWNTOWN PLAN DRAFT PLANNING CODE CHANGES

Foundation for San Francisco's Architectural Heritage
April 25, 1984

1. Section 102.8: Changes exclude exterior structural elements and walls from floor area calculations in C-3 zoning districts. If this change applies to FAR calculations for existing buildings, there will be more TDR to transfer from significant buildings, and more floor area developable on receiver site. This should increase TDR available from eligible sites. Existing structures should be treated the same as new construction for TDR purposes, especially from C-3-O and C-3-R use districts. **H.4.2 S.1.2 Z.1**

2. Section 102.10: In residential districts and in C-3-G and C-3-S the FAR ratios do not apply to dwellings. In these areas, housing would be allowed in excess of the base FAR up to the height and bulk limits on the site. If receiver site owners must pay high prices for TDR for non-residential use above base FARS, high income market rate housing may compete for the TDR demand from historic buildings. The housing competition may reduce the effectiveness of the TDR market, jeopardizing more contributory buildings, particularly where the rate of return on high income housing approaches the rate of return on office use when the price of TDR is included in the investment price for office only. We do not believe that the housing needs of San Francisco are being served by extremely expensive highrise housing over office buildings in these use districts. Such housing should not be allowed to compete for TDRs from historic structures. Therefore, housing should be included in FAR calculations in C-3-G and C-3-S use districts. **C.2.3**

3. Section 102.11 - 102.15: Changes in FAR calculations with exemptions for window bays, ground floor circulation, ground floor retail, child care and cultural or educational uses will limit the effectiveness of base FAR reductions (proposed in the Plan) for saving architecturally significant buildings. These exemptions from FAR calculations should be allowed for existing buildings for TDR purposes. The exemptions measuring overall FARs should be offset by further reductions in the base FAR for the C-3-G district to 6:1, and the C-3-S to 5:1. In the absence of further reductions, the imbalance between existing buildings and allowable FARs will continue the economic incentives to demolish significant and contributory buildings. **C.2.1 H.4.2 Y.1**

4. Section 124, Table 1: We recommend the following changes to Basic Floor Area Ratio limits, for the reasons explained in our cover letter and comments on 102.11-15, above:

District	Basic FAR	% Reduction From Existing
C-3-O	10:1	28.6
C-3-R	6:1	40
C-3-G	6:1	40
C-3-S	5:1	28.6
C-3-O(SD)	6:1	14.3

H.4.2 S.1.2 Y.1 Z.1

5. Section 125 (new): The meaning and wording of this section is very unclear. We presume it is intended to prevent lot-mergers with non-significant buildings in lieu of TDR, to maintain demand for TDR from significant buildings. We support this proposed change, with clearer language. **S.1.2 Z.1**

6. Section 127, TDR: TDR may be allowed from landmarks outside of C-3 districts to adjacent lots. This eliminates TDRs from non-landmark sites as currently permitted to adjacent sites. Such TDRs would have to be approved on a case-by-case review. Heritage supports this change. **S.1.2 Z.1**

7. Section 128, TDR in C-3 districts: TDR is transferable as a matter of right from significant or contributory buildings, landmarks, and non-contributory buildings in Conservation Districts 3, 4, and 5, subject to conditions in subsection (c). TDR is allowable for creation of open space so long as the park will not result in demolition of significant or contributory buildings. The ordinance should add designated landmarks to this qualifier, or should clarify that all designated landmarks are, by definition, significant buildings. **S.1.2 Z.1**

(c) Limitations on TDR:

o Shall be in the same C-3 district or to C-3-O(SD): this should be changed to prevent transfer of TDR from C-3-G and C-3-S to C-3-O(SD) to retain values of TDR from C-3-O and C-3-R properties; TDR should be transferable to C-3-O(SD) from eligible sites in C-3-O, C-3-R and C-3-O(SD) only. **C.2.1 H.4.2**

o Construction on the development lot shall not result in the demolition or alteration of another contributing or significant building. Unless the Commission retains the right to deny demolition of contributory buildings, the cause of the demolition cannot be tied to the TDR. Owners have the right to demolish without Commission approval, in advance of transfer of development. This should be changed to prevent TDR to sites of contributory or significant buildings, and designated landmarks, identified in the Plan (whether or not the construction of a new building is the cause of demolition). **C.2.1 C.2.2**

o The development must conform to the height and bulk requirements on the receiver (transferee) site. These height and bulk limits should not be so permissive as to create major site-specific impacts on the receiver site, such as loss of sunlight, pedestrian and auto congestion, etc. If impacts are excessive, public reaction to the first large buildings to result from TDR transfers could jeopardize the TDR system, and undermine the preservation policies of the Plan. **H.4.1**

8. Section 128(d)(3): The documentation of TDR transfers should require permanent restrictions on the site to prevent future demolition, in the event of increases in zoning densities or changes in zoning policy. **S.1.2**

9. Section 243: Financial area special development districts: Add preservation of landmarks to the purpose for the transfer of unused development to the SD district. This section should more clearly define what eligible transferee and transferor sites are and their location. **S.1.2 Z.1**

10. Section 133: The Department should consider imposing other mandatory setbacks above the base of buildings on other streets than those identified in Table 2, in order to preserve the scale and character of existing streets, and to reduce the impacts of new structures where large new development will be permitted south of Market. **H.2 H.4.2**

11. Section 243: Add after contributory buildings in line 6, "or designated city landmarks." A description of the location of the C-3-O(SD) district is needed. **S.1.2 Z.1**

12. Section 309: the relationship of the Design Review Process to the review of alterations to significant and contributory buildings under Section 11 should be explained. This process should also weight the architectural, historic and environmental values of existing contributory buildings against those of replacement structures on sites of contributory buildings, particularly if the Planning Commission retains discretionary or conditional review to approve or deny demolition of such structures as we have recommended. Appeals of the Director's decisions by the Landmarks Board should not be declined by the Commission, but should be heard in public hearings. **S.1.2 Z.1**

13. Article 11: The findings and purposes of Section 1101 should include historic values in each subsection. **S.1.2 Z.1**

14. Section 1102.1(b): The eligibility of proposed buildings for designation should be studied by either the Planning Director or Landmarks Board by staff or consultants qualified in matters of historic preservation and architectural history. **S.1.2 Z.1**

15. Section 1102: Should contain an introductory explanation that all significant and contributory buildings in C-3 districts have been evaluated by the Department utilizing criteria of the National Register of Historic Places, after evaluation and rating by independent evaluators, and therefore are considered to have architectural, historical and environmental significance individually (Categories I, II and III), or as a contributing structure to an historic district (Category IV). From the total number of 1,393 individually significant buildings and contributory structures, the following definitions and standards shall govern the designation of significant and contributory structures identified in the Plan. **H.1.2 S.1.2**

16. Section 1102(b) Designation Standards: Individually listed buildings on the National Register of Historic Places or designated City Landmarks should qualify for Category I and II significance. References to National Register eligibility in subsections (d) and (e) should be eliminated, in favor of more general language in Item 15 above. Such ratings might otherwise be challenged if formal findings of eligibility for the National Register have not been made by state or federal agencies. Determinations of significance should be made by the Planning Commission and Board of Supervisors based on ordinance criteria and prior analysis, rather than National Register status. **H.1.2**

17. Section 1102.1(b): The Planning Director's study of eligibility should be reviewed or conducted by the Landmarks Board. Notice of proceedings should be provided to parties initiating designation and any organization with a recognized interest in preservation as requested in writing by such organization. **S.1.2 Z.1**

18. Section 1102.1(e): There is no section 302.7 in the existing code or the proposed amendments. **S.1.2 Z.1**

19. Section 1102.2 to 1102.5: Findings should be made as a part of the blanket designation that the purposes and standards for designation are met by all of the appended structures, after due notice and opportunity to comment, pursuant to procedures followed in adopting the Plan and ordinance. **S.1.2 Z.1**

20. Section 1103, Conservation District Standards: These should include concentrations of buildings of historical quality, in addition to architectural and environmental quality. Reference should be made to the potential eligibility of large parts of the area as a National Register Historic District. **S.1.2 Z.1**

21. Section 1103.2: The findings should state that the districts designated meet the purposes and standards, and that procedures of notice and opportunity to comment have been met as a part of the Plan and ordinance approval process. Add (f) 300 Block of Pine Street as a designated Conservation District. **S.1.2 Z.1**

22. Section 1104: This section needs to be cross-referenced or merged with section 128. **S.1.2 Z.1**

23. Section 1104(a): The height, bulk and FAR limits on sites of demolished significant buildings should be limited to that occupied by the demolished structure. If a structure is demolished upon satisfactory findings of the Planning Commission, and after all appeals have been exhausted pursuant to Section 1106.7, TDR development rights in excess of the floor area of the demolished building should be transferable. In the event that demolition is carried out in violation of this chapter, the Commission should deny all development of the site in excess of the floor area of the demolished building, and any transfer of development to other sites otherwise permitted in excess of the floor area of the demolished building. The zoning for the site of a demolished building should not revert to the original height and bulk limits in either case, or owners will have the incentive to demolish rather than transfer TDR. **C.2.1**

24. Section 1104(b): Referenced section 1105.9 is not part of the proposed amendments. Alterations of contributory buildings should be reviewed by the Department for buildings where TDR has not been transferred. **Z.1**

25. Section 1104(c): This section should more clearly limit TDR transfer from unrated structures to those in Conservation Districts 3, 4 and 5. If allowed in Conservation Districts 3, 4 and 5 only, the purposes for permitting TDR should be made clear. The reference to "historic districts" is unclear because this term is undefined. TDR should not be permitted from sites of demolished contributory buildings, even when the scale of such buildings is maintained by new structures. **C.2.1 Y.1**

26. Section 1105.3, Review of Major Alterations: Efforts should be made to simplify or consolidate joint reviews by the Landmarks Board and Department Design Review, to avoid redundant and potentially conflicting hearings for project sponsors and interested parties. **S.1.2 Z.1**

27. Section 1105.3(a): The Landmarks Board will be unable to report within 20 days of referral, if procedures of section 1006.3(b) and (c) of Article 10 are to be followed. **S.1.2 Z.1**

28. Section 1105.3(b): This process may encourage redundant and potentially conflicting positions on major alterations by the Department and the Landmarks Board. Ways should be sought to consolidate or streamline these reviews. **S.1.2 Z.1**

29. Section 1105.4: Pursuant to Article 10, the advisory role of the Landmarks Board to the Planning Director, the Planning Commission and the Board of Supervisors should be maintained. The reports of the Landmarks Board should be available to the Planning Commission along with the Director's report. **S.1.2 Z.1**

30. Section 1105.5(a): Requests of applicants or other persons within five days of the Planning Commission meeting is unworkable due to the limited advance time for distribution of Planning Commission calendars (typically available on the Monday of the Thursday Planning Commission meeting). **S.1.2 Z.1**

31. Section 1105.5(c): The reference to subsection (d) is missing. **S.1 .2 Z.1**

32. Section 1105.7(b)(4): Should read "contemporary designs are . . ."

33. Section 1105.7(b)(6): The more specific limits of TAble 5 of the Downtown Plan regarding alterations to Category II buildings should be incorporated into the ordinance. Heritage has recommended modifications and corrections to this table, which should be made before incorporation. **S.1.2 Z.1**

34. Section 1106.1: A reference from this section to section 1106.7 and Article 10 is needed. Demolition Applications: Unused TDR available from the site of proposed demolition, together with appraised value of the TDR should also be provided as information, along with evidence of efforts made to market such development rights. **S.1.2 Z.1**

35. Section 1106.2: This section requires the Planning Director to approve applications for demolition of contributory buildings within 30 days, except where TDR is transfered. In Conservation Districts, approval is held up until replacement structure is approved. Neither the Director nor the Planning Commission have the authority to deny demolition of such structures. **S.1.2 Z.1**

These limits (demolition "as of right") are of greatest concern to Heritage. They are the greatest weaknesses of the ordinance. **S.1.2 Z.1**

There are 219 buildings in Categories III and IV, and more than 43 are jeopardized with short-term demolition according to the DEIR and staff analysis, and more than 80 are threatened before the year 2000. **S.1.2 Z.1**

Demolition of contributory structures should be subject to a conditional use review of the Planning Commission, after review by the Planning staff and the Landmarks Board, in the same manner as major alterations permits. The Commission could handle some of these on a "consent" calendar, as in major alterations cases, where appropriate. The project sponsor should meet certain standards or requirements for the permit and for the replacement structure before a permit could be granted. **C.2.2**

Unused zoning potential should not be provided in the form of TDR for sites of contributory buildings when replacement structures are required to conform to the character of the Conservation District, yet the Commission should have the authority to deny full utilization of zoning capacity to retain the character of the District, and protect other public values, e.g., sunlight. **C.2.2**

36. Section 1106.4: Time frames for Landmarks Board response might be provided here, consistent with Article 10 procedures.

37. Section 1106.7(b), Demolition Standards: Change to: . . . "value of TDR attached to the property no reasonable use . . . " not "in." Omit "substantial" remaining market value. The Department may want to call for independent consultation when needed, e.g., 350 Bush. **S.1.2 Z.1**

38. Section 1106.7(c): Demolition of contributory buildings should not be permitted without restriction. **S.1.2 Z.1**

39. Section 1106.7(d): Demolition of Category IV buildings even after TDRs have been transferred, is permitted before a conditional use permit for the new structure is approved. This section should be completely eliminated. **S.1.2 Z.1**

40. Section 1106.8: This section ignores the potential historical significance and qualities of age and texture of contributory buildings. These are qualities that are not replaceable, even if the size and scale of the older structures can be replicated. **C.1.1 Z.1**

41. Section 1114: Article 11 supercedes Article 10 in the event of conflict between the two provisions. The intent and practical effect of this section is unclear. This might be revised to provide that the most restrictive provisions shall apply, in the event of conflict. **S.1.2 Z.1**

SUMMARY OF ESTIMATES FOR BUILDING DEMOLITION
DOWNTOWN PLAN EIR

I. Existing Buildings (Table IV-H-3)

1. Heritage and Landmarks

	Subarea 1	Subarea 2-7	Total	Summary
Heritage A	47	83	130	
Heritage B	84	212	296	
Heritage C	188	775	963	
National Register or City Landmarks	17	14	31	
TOTAL	336	1084	1420	1420

2. Downtown Plan

	Total	Summary
Category I	229	
Category II	37	
Subtotal significant	226	
Category III	22	
Category IV	197	
Subtotal contributory	219	
TOTAL DEPARTMENT OF CITY PLANNING	485	485
% of Heritage	34.1%	

II. Estimates of Demolition - DEIR

C.3.1

1. Summary (I-H-1)

	Categories I-IV		Summary
1984-1990 --	Significant and Contributory Buildings:	43	
1990-2000 --	Significant and Contributory Buildings:	41	
	TOTAL		84

2. Impacts (IV-H 25-29)

	Subarea 1	Subarea 2-7	Total	Summary
1984-1990	43	7	50	
Category I	1	--	1	
Category II	0	--	0	
Category III	0	--	0	
Category IV	4	--	4	
Subtotal	5	--	5	
1990-2000	15	24	39	
Category I			0	
Category II			1	
Category III			3	
Category IV			4	
TOTAL THREATENED (A,B,C)				89
TOTAL CATEGORY I-IV				13

3. TDR supply/demand effects (IV-B 71-72)

Likely to be retained:

o Sites with few or no TDRs 40% of contributory buildings (.40 x 266):	106
o Buildings least likely to be retained 10-15% of contributory buildings (.10-15 x 266):	27-40
o Remaining buildings (some would be demolished) 35-50% of contributory buildings:	93-133
If it is assumed that 1/2 would be demolished:	47-67
TOTAL CONTRIBUTORY ASSUMED TO BE DEMOLISHED, (Category III and IV):	74-107

C.1.2

RECEIVED
JUN 4 1984
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

John Bardis
1501 Lincoln Way
San Francisco, CA 94122

June 4, 1984

Honorable Toby Rosenblatt
President
City Planning Commission
City & County of San Francisco
City Hall
San Francisco, CA 94102

RE: Response to Draft EIR on Downtown Plan

Dear President Rosenblatt and Honorable Commissioners:

The proposed Downtown Plan, i.e. zoning ordinance, is, in effect, a proposed urban development strategy to guide the growth of the San Francisco economy for the rest of this century. **A.1** **Z.1**

The implementation of this plan will determine the future rate of growth and, most especially, the future balance of growth of our city. This plan will have profound impacts on the number and types of new jobs created, housing supply and costs, municipal utilities, public transit service and facilities, auto traffic, taxes, fees, and much more. **A.1** **Z.1**

Thus, the review of the Draft EIR prepared for the proposed Downtown Plan is one of the most important, if not the most important, documents which will be considered by the City Planning Commssion in this decade. At the public hearing held on the Draft EIR, I and many other citizens testified and described the numerous errors and omissions which make this document an incomplete and woefully inaccurate description of the impacts of the proposed Downtown Plan on the environment, quality of life, and vitally of the economic life to be enjoyed by the people of San Francisco under this plan. **S.1.2** **S.2** **Z.1**

As I testified at the public hearing, the limited time allowed for public testimony on this massive document and supporting documents made it impossible to present a comprehensive description of the numerous deficiencies in the Draft EIR. And as I indicated at that time, it is my strong desire to present in writing to you and the department staff a comprehensive and more detailed description of the numerous errors and omissions in this document. **S.1**

Unfortunately, it has not been possible for me to complete the exhaustive research necessary to respond properly to the Draft EIR and do this before the June 4th deadline. Nevertheless, I believe this public issue is so important to the future of San Francisco that I still plan to prepare my written comments and hopefully submit them to you during the next week. I believe it is essential that your honorable Commission have a written record of the numerous deficiencies in this document -- even if this means adding a week to what has been a five year public process. **S.1**

In the forthcoming written response to the Draft EIR there will be a detailed description of the following major deficiencies in this document:

- The failure to consider an alternative growth strategy which would produce more growth in the employment of San Franciscans and even greater growth ofthe city's economy with far less impact on our city's **Q**
  housing supply, transit and traffic infrastructure, and requiring less investment of public funds. **Q.4**

- The failure to describe the impacts on our city of the past two **A.1**
  decades experienced with this same growth strategy being proposed **B.11**
  for the next two decades. **S.1**
  Z.1

- The failure to undertake a truly objective study and review process **B.11**
  in collecting and evaluating the data for the "study" which was used **B.2.1**
  as the basis for developing the description of the impacts resumably **D.2**
  described in the Draft EIR of the proposed Downtown Plan. **E.1**

- The failure to describe the impact of the proposed plan on the economy and communities in the Bay Region as well as the adverse impacts experienced by the region by the past two decades of growth under a similar growth strategy for San Francisco.
  B.1.1 B.2.1 D.2 D.3.2 E.1

- And numerous other deficiencies. **N.3**

These written comments will be provided to you and your staff in time so that they can be considered properly and responded to in the Final EIR. **S.1.3**
S.2

Yours truly,

John Bardis

ABAG
ASSOCIATION OF BAY AREA GOVERNMENTS

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RECEIVED
JUN 4 1984
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

June 1, 1984

Mr. Alec Bash
Environmental Review Officer
City of San Francisco
450 McAllister
San Francisco, California 94012

Re: DEIR, San Francisco Downtown Plan

Dear Mr. Bash:

Thank you for the opportunity to comment on this document. The following staff comments reflect general concerns of locally elected officals as embodied in ABAG's Regional Plan 1980. These comments focus on the employment projections as well as the energy, seismic safety, and worker residence analyses of the plan. ABAG's Executive Board has not taken a position on this document, nor on the proposed plan. **Z.1**

Employment Projections

ABAG's analysis of the plan indicates that the C-3 area employment projections are too high, because the plan assumes too a high an employment base in 1984 and too much job growth 1984-2000. Our analysis is based on the following data. **B.1.1**

First, we estimate that as of March 1980 there were 265,000 individuals working in the designated area. In 1981, this number was estimated at 270,000. By the end of 1982, during the height of the recessionary period, the estimated employment had fallen to 267,000. ABAG estimates that C-3 employment will be between 269,000 and 273,000 by the end of 1984, depending upon economic conditions and development plans in other parts of the region. These estimates are based upon unemployment rates, total county employment growth and vacancy rates in downtown office buildings. Therefore, for the base period we estimate (at the most) a total employment in downtown (C-3) San Francisco at 273,000 jobs by the end of 1984. This is somewhat less than the estimated base in the DEIR of 280,000. **B.1.1**

Second, our data indicate that downtown job growth between 1984 and 1990 will be less than is projected in the Downtown Plan. ABAG estimates a net employment increase of between 18,000-20,000 jobs during this period. From 1990-2000 the net increase in the C-3 area is expected to be about 18,000 jobs. ABAG has analyzed a series of scenarios to ascertain the total potential growth in net employment over the period 1980-2000. Under the most optimistic scenario, which assumes that the past trends will continue into the future, workers in San Francisco increase by approximately 130,000. However, this scenario is unrealistic given the increased dispersion of middle management office employment throughout the region, **B.1.1** and the unknown impacts of improved communication technology on the need to centralize employment. Even if the most optimistic scenario were attainable, the assumption that 70% of this growth will occur in the C-3 area (as outlined in the DEIR) appears unrealistic. B.1.1 B.1.2

Most of the long term development potential of the City of San Francisco lies in the South of Market areas, the C-3-S areas of the C-3 zone and the Northern Waterfront area of the City. ABAG estimates that in those areas the City will add approximately 39,000 jobs to its employment base between 1980-2000. These 39,000 jobs will be located in the following census tracts -- all outside the C-3 area:

10100
10500
11100
12200
15100
15700
18000
20100
22600
22700
22800
23100
20102
30500
60600
60700
19701 part

The majority of the growth will be in the area designated "South of Market". ABAG also estimates that the remainder of the city will add an additional 23,000 jobs. This includes areas such as the "Civic Center," the University of California Medical Center, colleges and universities throughout the city, and local-serving retail employment. The remainder is important because it is tied to the redevelopment efforts throughout the city. Overall, ABAG estimates that approximately 104,000 jobs will be added to the employment base between 1980-2000. Therefore, the plan's estimated increase in employment of 91,000 in the C-3 area appears high. B.1.2

A major reason for the discrepancy between ABAG employment forecasts and those identified in the Downtown Plan appears to be that the plan's estimates are based upon baseline or trend projections. Although baseline or trend projections have their usefulness, they should only be used to reflect an "ideal" or maximum level. Baseline projections normally are only used for sensitivity analysis or to assess the extreme case. In particular, baseline projections are not as pertinent in assessing the relative growth potential of San Francisco and the C-3 area because of the major changes that will result from the decentralization of office employment throughout the Bay Area. Trend analysis would not account for such variation. B.1.1

Therefore, ABAG staff members recommend that the employment projections in the Downtown EIR be revised to be consistent with ABAG's estimates. Although our projections are just that: estimates of the future, these estimates should be used as a base. Any variation from the base should be defensible in the context of sound economic reasoning and within the context of the total regional economy. B.1.1 B.1.2

Independent of how much the plan projects that employment will increase, ABAG staff members are concerned about the plan's assumptions regarding occupational distribution. Our analysis of the jobs that are going to San Francisco indicates a major skewing in income distribution. San Francisco and the C-3 area is expected to lose large numbers of jobs in communications and utilities over the next several years, due to facility and expansion and transfer in the Alameda and Contra Costa counties. In addition, major expansion of data processing and information support services in the F. I. R. E. and Business Services sectors will occur in the East Bay, drawing jobs from San Francisco. The type of jobs that San Francisco will attract will be corporate support, marketing services and headquarters operations. Therefore, ABAG's concern is that the higher paying jobs will probably go to the non San Francisco residents, with the secretarial, support, janitorial services going to San Francisco residents. The reason for this is associated with the housing situation in San Francisco and the inability of the City of San Francisco to diversify its economy. ABAG recognizes that diversification will not be easily accomplished, but it is an essential problem that must be addressed. **B.1.2** **B.5.3**

Worker Residence Patterns and Housing

The DEIR lacks any analysis of the plan's impacts on other Bay Area communities despite the fact that the plan assumes that these communities will provide two-thirds of the workers needed for new San Francisco jobs. The plan projects 90,300 additional workers in the downtown area by the year 2000 with 60,000 of these workers expected to live outside San Francisco. Table VII.D.2 indicates, as is shown below, where these 60,000 workers are expected to live. **D.3.2**

Area of Residence	
San Francisco	30,300
East Bay	37,100
South Bay	12,900
North Bay	9,800
Other	300
Total	90,300

First, the DEIR should explain how these projections were created and what assumptions they are based on. Second, the DEIR should provide data about job and housing growth in other Bay Area communities which verifies the ability of those communities to absorb this additional growth. Finally, the DEIR should analyze the job-residence patterns to determine what housing and transportation impacts will result. Specifically, the analysis should include information and a map with the following data: **D.2** **D.3.2.1** **D.3.2.3**

E.2

- what communities are expected to have more workers than jobs; D.2.9
- what communities are expected to have more jobs than workers; and D.3.2.4
- what public transit is available between subregional areas around the Bay and downtown San Francisco.

Some of the required data can be obtained from our Projections 83 data base. When this information is mapped, people reading the DEIR should be better able to analyze the plan's worker-residence projections. D.2.9 D.3.2.1

We are concerned because the plan assumes that other cities around the Bay will absorb the housing demand created by new jobs in San Francisco. Meanwhile, many Bay Area cities, which in the past had more residential growth than job growth, are approving job producing projects at rates which exceed new housing growth. In fact, the few cities still approving more housing than jobs are often the communities furthest from San Francisco which lack direct public transportation links to the city. It is important that the DEIR address the impacts of this situation. The increased commuting which this plan will cause will affect the livability of the Bay Area through decreased air quality and increased traffic congestion. D.2.9 D.3.2.4

Beyond this, the DEIR lacks a detailed analysis of the housing needs of San Francisco's new workers. Regardless of whether they are to live in San Francisco or elsewhere, it is important to examine what types of housing are likely to be affordable to workers. This analysis should project worker income and estimate ranges of housing costs which will be affordable at various income levels. These data should then be compared to the prices and types of housing being built inside as well as outside San Francisco, since two-thirds of the workers are expected to live in other communities. Some conclusions should be made about how well incomes and housing prices match. If San Francisco's projections are to be realized, this is precisely the type of information which must be shared with other, affected communities. Then, San Francisco and other cities can develop plans which encourage the types of housing which are not being built. D.2.6 D.4

Energy

The plan discusses the fact that new buildings will have to be designed to meet current Title 24 energy standards and that existing buildings will need to be upgraded. The State is now adopting new non-residential energy conservation standards that should reduce energy consumption approximately 40%. Any mention of "current standards" should distinguish which standards the plan is referring to. Energy consumption will be substantially lower if new buildings are constructed to the new standards and existing buildings are upgraded. G.1

Seismic Safety

The plan's seismic safety analysis adequately discusses ABAG's concerns. We support the author's suggested mitigation measures, particularly measures 1, 7, 9, and 18. We suggest that estimates of costs associated with these mitigation measures would be useful to decision-makers. K.6

Other Comments

The Census Bureau defines a housing unit according to certain standards such as separate kitchen and bathing facilities and a separate entrance. In most cases, rooms in residential hotels would not qualify as housing units. Any analysis which indicates that data from the 1980 Census pertaining to housing was affected by residential hotels is probably incorrect. **D.1**

If you have any questions regarding these comments, please contact Patricia Perry of our staff. Her direct-dial number is 415-464-7937.

Sincerely,

Yvonne San Jule
Budget and Planning Officer

JUN 4 1984
OER

June 4, 1984

Mr. Alec S. Bash, Environmental Review Officer
Department of City Planning
450 McAllister Street, 5th Floor
San Francisco, CA 94102

Attached are Comments on the San Francisco Downtown Plan Draft EIR. I apologize for both their length and their handwritten form. Time constraints and the June 4th deadline have prevented my condensing them and having them typed. Should a typewritten version be of more use to you, please contact me and I will try to accommodate your request as soon as possible. **Z.1**

Carl Imparato
San Franciscans for Reasonable Growth
781-4211 (X4335), 527-6811

CARL IMPARATO
SFRG

JUN 4 1984

Comments on Downtown Plan Environmental Impact Report (EE81.3)

June 4, 1984

San Franciscans for Reasonable Growth

(1) Throughout these Comments, the following terms should be understood to be defined as follows:

- transportation systems: all regional and local highways and transit agencies impacted by San Francisco growth
- transit agencies: all regional and local transit agencies impacted by S.F. growth
- transportation impacts: the transportation impacts measured in the EIR (including the impacts on highways, transit agencies, parking and pollution), augmented by the impact "measures" requested in these comments (i.e., congestion delays, average commute times, etc.)

E E.2 E.3 E.4 I

(2) Since the Downtown Consultant's Report is incorporated by reference into the EIR, please incorporate our Comments of June 30, 1983 on that Report. (A copy of those Comments is attached.) **S.1.2**

(3) Our basic concerns with this Draft EIR revolve around two major points: **S.2**

(i) the Draft EIR does not address the real impacts
(ii) the Draft EIR uses unsupportable methodologies for the analysis of the impacts which it does address. **R**

Regarding the first point: Even under the artificially low growth projections used in the Draft EIR, the Downtown Expansion "Plan" would create 91,000 more C-3 workers plus 75,000 additional non-C3 workers. Despite the enormity of these numbers, the EIR :

- does not address many of the impacts of this growth on the Bay Area region
- does not factor in the appropriate regional growth in its estimates of regional transportation and housing capacity available to support SF growth
- does not use useful measures of the impacts (Where are the descriptions and real measures of the massive traffic jams associated with beyond-capacity highways, for example?)
- does not address the multi-billion dollar transit and transportation system improvement costs required by the "Plan"
- does not address the issue of rental housing needs and mitigation
- does not even touch upon the issue of the types of jobs needed by unemployed City residents
- does not propose substantive mitigation measures to impose on development, the real impact generator; but instead, places the burden of mitigation on the region's residents and on public agencies outside San Francisco.

B.1.1 B.2.1 B.5.1 B.5.2 D.3.1 D.4 D.5 N.3 P

Regarding the second point: We contend that a major share of the impacts has been covered up by the use of an unvalidated, unjustifiable, indefensible growth projection methodology and unsupported transportation mode shift assumptions. Together, these both understate the amount of growth which would occur, and minimize the magnitude of the environmental impacts associated with even the reduced growth projections.

B.1 B.2 E.1.4

Both of these points will be addressed in the remainder of these Comments

Z.1

(4) We reject the contention that the employment share/forecasting approach is a more valid methodology than the land use/lot-based approach for projecting future employment growth and transportation demand, particularly for use in project EIRs. There are a tremendous number of uncertainties inherent in the forecasting approach. The variation in forecasts as a function of the input assumption uncertainties may be so great as to make the evaluation of impacts (and subsequent mitigation requirements) impossible. When one considers the initial question of which growth rate to use in the "baseline" analysis (1.7 million gsf of office development annually vs. 2.5 million gsf – a 50% variation), and then adds in the large number of subjective factors used in the DCP's model, it becomes fairly clear that almost any result can be output from such a model, depending on the model user's motives and goals. The lack of a firm, validated statistical database is another drawback. Finally, the reliance of this type of model on inputs from regional forecasting models (themselves products of subjective input assumptions), which cannot produce reliable results on a disaggregated, community-by-community basis, makes the use of DCP's forecasting model all the more questionable for anything other than extremely gross planning and scenario comparison purposes.

B.1.1 B.1.2 B.1.3
E.1.6 E.1.1.1

A forecasting model can be used for crude long-range projections, but only when it is used to produce a range of estimates for employment growth and transportation demand as the input parameters and assumptions are varied over the full range of their possible (realistic) values. If the model were used for this purpose and in this manner, the incorporation of its results into this EIR to project conditions in the year 2000 might be valid. We note, however, that this range of studies has not been performed. The results of only 1 scenario and set of assumptions (that which meets the political goals of the DCP?) have been presented in the Draft EIR. Therefore, the methodology has been used improperly, and its results are of little real value. In fact, by purporting to be what they are not, the results are deceptive and should consequently be deleted from the EIR. Should it be desired to use a model of this nature for gross forecasts in the Final EIR:

(i) the inner workings of the model should be completely disclosed; and

(ii) the model should be run using the assumption and parameter ranges suggested in our comments and the comments of other parties.

B.1.1
E.1.1 E.1.1.1

We wish to make it clear that we believe that the use of a forecasting model of the type employed in this Draft EIR is completely inappropriate for short-term cumulative analyses, in either this EIR or project EIRs. For short term analyses, the list-based approach is the only valid approach:

(i) the amount of growth to use in this type of analyses is clear. (Objections that the land-use approach does not account for projects on the list which are never built are without merit. Based on review of historic fallout rates from past lists, the total gsf on the list can be appropriately discounted. Office vacancy rates can be handled in a similar manner.)

(ii) the consequent employment and transportation impacts follow directly using measured quantities (employees/gsf, modal splits, employee residence distribution). Any modifications to these measured factors to account for assumptions about the future (e.g., greater transit usage) are simply implemented, clearly defined, and, most important of all, cessible to the public.

In short, using the list-based approach, it is possible to project short-term (5-10 year) impacts, and it is much more difficult for planning agencies to make unsubstantiable assumptions and subjective judgments, or to generally manipulate a model, thus protecting the integrity of the CEQA process.

B.1.1 B.1.2 B.1.4.6
E.1.6

Summarizing, we contend that

(i) use of the "forecast" or "employment share" methodology can only be allowed for gross long-range projections associated with broad planning purposes (i.e., not for cumulative impact analyses in project EIRs), and then, only if its use is qualified and handled properly, as described above;

(ii) the land use approach must continue to be the basis for short term forecasts, project EIR cumulative and project-specific analyses, and for associated mitigation requirements.

Use of the questionable forecasting methodology, as proposed in this Draft EIR, is inconsistent with both the letter and the spirit of CEQA. There is far too much uncertainty in its "conclusions".

B.1.1. B.1.2

At a bare minimum, then, the Draft EIR's analyses should be re-done using the list-based approach for the short term. For the long-term, the forecast methodology might be used to produce a range of impact estimates, using the full range of reasonable assumptions (and in particular, the higher, 1980's growth rates which we've been experiencing). Mitigation should, of course, be tailored to the worst-case impacts. **B.1.1 B.1.2 E.1.6 P**

(5) The methodologies (employment and transportation) proposed in this Draft EIR are complex and constitute a significant departure from established models used in EIRs. Therefore, the burden must lie with the EIR authors to PROVE THAT THESE MODELS ARE REASONABLE. **B.1.1 B.1.3 E.1.1 E.1.2**

On the face of it, the methodologies appear to be patently unreasonable. They don't replicate recent trends: they project C3 office project approval rates of approximately 660,000 gsf for the next 3-4 years, and just 840,000 gsf of office growth annually during the 1990's. Non-C3 SF growth should produce impacts roughly equivalent to C3 growth impacts. Yet the Draft EIR's non-C3 transportation impacts are practically invisible! **B.1 B.2 E.1.1.2 E.1.5**

Therefore, please address the following questions in detail:

- How have the employment growth and transportation models been calibrated? How have they been validated?
- What are the bases for the input assumptions which are made?
- How sensitive are the methodologies to the input assumptions? Demonstrate the sensitivity of the models to the baseline assumptions (suppose the baseline growth rate were 2.5 million gsf of office growth per year) and the other input parameters and assumptions (mode shifting, employee residence patterns, locational preference as a function of rents, gsf/employee as a function of rents, etc.) **B.1.1 B.1.3 E.1.1 E.1.2**
- In what other EIRs in this state have these methodologies been used?

(6) Regarding the growth rate assumptions input to the employment forecasting methodology: they are substantially lower than those which should be input, based on the amount of office space currently proposed and the amount approved during 1981-1984. History has shown that, after smoothing out temporary periods of oversupply and undersupply of office space, market economists (i.e - the private developers who put their capital on the line to develop office space) are invariably better prognosticators of future economic activity and growth than are planners. From the standpoint of which group has the greatest incentive for accurate forecasting, this makes complete sense. (Who is responsible for the DCP's growth estimates?) In this case, we stand together with the development community in claiming that the low growth rate assumptions used in the Draft EIR are incorrect.

B.1.1
E.1.1.1

If the forecasting methodology is retained in the Final EIR, it should be rerun with the more appropriate assumptions described in these Comments. There are only two facts regarding future growth:

(i) the recent project approval rate
(ii) the cumulative development list.

Both of these point to growth rates much greater than those used in the Draft EIR, discrediting either the forecasting model and/or the Draft EIR's input assumptions. Please update the baseline growth rate to that associated with the project approval rate of the 1980's and rerun the impact analyses and forecasts.

B.1.1 B.1.2
E.1.1.1

(7) Please provide data and graphs regarding office project approval rates, including conversions, for the 1960-1984 period (at 5 year intervals, for C3 growth and for non-C3 growth). **B.1.4.7**

8) We believe that the use of 1970's growth rates, rather than more recent growth rates, is both arbitrary and unacceptable for the forecasting methodology. Why is the use of 1970's project approval data considered a better indicator of future growth than 1975-1984 data or 1980-1984 data? What rationale was used to throw out the most recent 5 years' data? **B.1.2**

) The forecasting model predicts future growth based on the 1970-1980 growth rate, ignoring the 1980-1984 growth rate data. How well would this model have predicted C3 office growth for 1980-84 using the 1965-1975 growth rate? How would the model predict 1980-1984 non-C3 growth based on "historic trends? **B.1.2**

Similarly, how would 1985-1989 C3 and non-C3 growth have been predicted by the model based on the 1970's growth rates? **B.1.3**

How do these predictions compare to actual project construction rates and to project approval rates in the 1980's? **B.1.1**

(10) What if the office growth rate accelerates to 1.5 times (or 2 times) the present growth rate? What does the EIR's methodology predict then? What impacts does the transportation methodology then predict? **B.1.2** **E.1.1.1**

(11) Where did the primary data used in the forecast methodology come from? (ABAG?) Please describe this data, its limitations, and the assumptions that were used to produce *that* data. **B.1.**

(12) Page H.40 of the Consultant's Report states that employment densities are assumed to increase by 5% for Alternatives 4 and 5, by 1.5% for Alternative 3, and by 0.5% for Alternative 2. Please explain the basis upon which these precise figures were chosen. **B.1.1**

(13) Regarding the growth rate estimates in employment subcategories: Page H.24 (Consultant's Report) and page H.9 (Draft EIR) show an annual growth rate of 3.9% in the Business and Professional Services sector for 1981-2000. This is substantially lower than the Citywide annual growth rate for this sector for 1972-1981 (8.55%). Similarly, the projected 1981-2000 FIRE growth rate is 1.9% (p. H.23, Consultant's Report; p. H.9, Draft EIR), considerably lower than the 1972-1981 rate of 3.7% (Draft EIR, p. IV.C.13). **B.1.4.3**

Using the historic 1972-1981 growth rates (and not even accounting for the tremendous boom in office project approvals in the 1980s) would result in a forecast of approximately 65,000 more workers than the Draft EIR predicts, in these two categories alone! (This points out the high sensitivity of the forecasting methodology to the growth rate assumptions input in the various subcategories.) **B.1.2** **B.1.3**

B.1.1 B.1.2

What justification (if any) is there for the use of the EIR's low growth estimates in these subcategories?

The observation noted above points out, once more, that the appropriate use (if any) of the forecasting methodology is to produce a range of crude forecasts from a range of input assumptions. It also points out that the "baseline" forecast is not even an extrapolation of 1970's trends, as the EIR implies, but a rate lower than the 1970's rate.

B.1.1 B.1.2

) The EIR acknowledges that the 1970's office growth rate was 1.7 million gsf per year, and the 1980's rate has been 2.5 million gsf per year. Yet the EIR analysis arbitrarily chooses the 1.7 million gsf per year rate for the "baseline" analysis. Why?

B.1.1 B.1.2

If future growth is indeed 2.5 million gsf per year, rather than 1.7 million gsf per year under baseline conditions, the impacts of development would presumably be increased by 50%. The Downtown Plan, as well as transit agencies, highways, etc., will not have been designed to cope with this greater level of impacts, leading to an urban catastrophe. Does not prudence dictate that, if there is some question as to which growth rate to use, the rate which produces the most severe impacts be used, in order to produce a Plan and mitigation package capable of handling those impacts?

B.1.1 B.1.2

(15) Non-C3 San Francisco growth and its impacts are improperly analyzed. The Draft EIR admits that during the 1950's, non-C3 growth will accelerate (in fact, that has already been occurring), and will be equivalent to more than 80% of the C3 growth rate. Thus, non-C3 transportation impacts should be on the same order as the C3 impacts.

B.2.1
E.1.5 E.1.7

Yet, the EIR uses "historical growth rates" for the non-C3 analysis. The consequence: non-C3 impacts are almost invisible! For instance, all of the non-C3 growth (approximately 75,000 more workers) makes no contribution to traffic growth on the Golden Gate Bridge - not 1 additional car (p.J.22)!

B.1. B.2.1 E.1.5

Non-C3 growth must be analyzed on an equal footing with C3 growth. It is not that different from C3 growth. The excuse that a fictitious line separating the C3 from the non-C3 districts can be used to neglect major environmental consequences has no merit. (The Planning Commission's recent approvals of major office projects and conversions outside the C3 district further substantiate this point.) Non-C3 growth will contribute to transit, transportation and housing impacts of the same order of magnitude as those due to C3 growth. Those impacts must be adequately analyzed and discussed. Please revise the analysis to do so.

B.2.1 B.2.2
E.1.5

(16) To the extent that San Francisco growth will have an impact on regional resources (as 165,000 additional San Francisco workers undoubtedly will), the demands of regional growth on those resources must also be incorporated

into the EIR impact analyses as modifications to the "base case" to which San Francisco growth is applied. The impacts of downtown Oakland and Peninsula growth on available highway and transit capacity are just two of the most obvious examples of this. It is improper for the Draft EIR and the Downtown Plan to presume that all remaining Bay Area transportation (and housing) capacity can be allocated to accommodate S.F. growth. If all municipalities were to employ this approach in their EIRs and plans, capacity would be double-, triple- and quadruple-counted, and the resulting impact analyses would be meaningless. This is clearly at odds with the intent of the CEQA process. Why weren't the transportation and housing impacts which are documented in Oakland's EIRs, the S.F. Executive Park EIR, etc. incorporated into the analyses?

B.2.1 B.2.2 E.3.1
E.1.5 E.4.3
E.2.3 D.3.2.1
E.2.4 N.3

(7) Even for the low growth rates assumed in the EIR, the peak BART ridership increase to the East Bay out of the C-3 district alone is 89% (1981-2000). The EIR optimistically assumes an 88% increase in BART capacity during that period, concluding that this match between demand and capacity increases implies that no problem exists. That is, San Francisco growth is assumed to totally consume this regional resource. But growth in downtown Oakland will also make demands on Concord-bound BART service. That growth should therefore be factored into the analysis. It is not. This same situation -

- in which it falsely appears that SF growth can be accommodated - occurs with regard to traffic on regional corridors serving San Francisco, some other transit agencies, and housing availability. **E.2.3 E.3.1 D.3.2**

Regional growth must therefore be incorporated into the EIR analyses to the extent that SF growth has a regional impact. Regional analyses should consider, at a bare minimum: transportation, housing, increased congestion on local streets (parallel to I-80) in East Bay communities due to increased SF-bound commute traffic, and increased commuter parking in East Bay neighborhoods near BART stations due to the 89% increase in SF-bound BART commuters.

B.5.4
D.3.2
E.2.3
E.2.4
E.2.5
E.3.1 E.4.3 N.3

The regional analyses should consider

(i) conditions today - both within SF and on regional corridors and in other communities impacted by SF growth **B.2.1 B.2.2**

(ii) future conditions incorporating regional growth but no new SF growth

(iii) Case (ii) above, plus SF growth. **B.2.1 B.2.2**

Q.1
N.2
N.3

(18) The Final EIR should excise all references to the "Goals of the Plan". These "Goals" are not a reality. They are not a mitigation. They are wishes, fictions, not concrete implementable proposals. For example: "If the Goals of the Plan were achieved, there would not be a parking deficit." (I.E.5). How would this be achieved? Through a 13½% increase in vehicle occupancy (p. IV.E.22) and a 13% increase in the transit use portion of the model split. But the most the EIR is willing to presume (and what is the justification for these numbers?) is

a 4% increase in vehicle occupancies and a 5% increase in the transit split figure

A.1 E.1.4.1 E.4.1 Z.1

Placing these "Goals" in the EIR is clearly intended to mislead the public into thinking that the Downtown "Plan" is indeed manageable, by lending an aura of legitimacy to the Goals. But EIRs must contain unbiased, objective information - not dreams. References to the "Goals" should be deleted.

A.1
E.1.4.1
Z.1

) Regarding Fiscal Factors (pp. II.12-13): this section makes reference to the Consultant's Report's "conclusion" that the C3 district will produce a surplus. That "conclusion" has never undergone public scrutiny. In fact, we strongly disagree with this unsubstantiated "conclusion" and note the years of controversy surrounding the issue. The Final EIR should either delete this section, or note the controversy and conflicting opinions and qualify its "conclusions" as subjective. It should also note all of the public costs (BART expansion, highway improvements, preferential parking programs, etc.) which were not part of the fiscal "analysis".

E.2.7 E.3.3
Z.3

2) P. II.11 claims that the EIR "estimates a growth in office space of 8 million square feet from 1984 to 1990 and another 15 to 24 million square feet from 1990 to 2000...". That statement is inconsistent with the numbers presented throughout the Draft EIR.

B.1.4.9

(21) Regarding the relationship of the Downtown "Plan" to the Master Plan: the Draft EIR purports to show consistency (p IV.A.10) between the "Plan" and Commerce and Industry Element Objective 6, Policy 1: "Encourage continued growth of prime downtown office activities so long as undesirable consequences of such growth can be avoided." How, in fact, does the Downtown "Plan" propose to control the "undesirable consequences" of downtown office growth? What if the EIR's extremely crude analyses is incorrect? What if the growth rate is indeed greater than assumed? What mechanism will be used to control the "undesirable consequences" in that event?

A.1
B.1.1 B.1.2
R P.2.3

(22) Regarding Floor Area Ratio redefinition: The new calculation method seems to exclude, for all practical purposes, the ground floors of office buildings from EIR calculations. Buildings currently calculated as having FAR's of 7:1 would have their FAR's reduced to 6:1 under the proposed redefinition. Thus, the FAR limit "reductions" from 7:1 to 6:1 in areas of the C3 may be largely illusory. The public needs to know whether these FAR limit reductions are in fact real or just a sham. Therefore, please show the FARs, under the existing rules and the proposed rules, of the major office buildings approved in the last 5 years.

B.1.2
H.4.2

(23) Regarding development potential: Page II.9 acknowledges that development in the non-C3 areas of SF is quite sensitive to C3 policies. This indicates a need both for integrated planning (which is clearly not being done) and for the data requested below:

(i) What are the locational preferences of different types of business activities? What is the sensitivity of each type of activity to rent levels?

(ii) In the model used for this EIR, when development is shifted away from the C3 (e.g., by the Downtown "Plan") where does it go? to South of Market? elsewhere in the region? out of the region?

(iii) For each of the alternatives, what is the projected C3 office growth, non-C3 SF office growth, and total (C3 + non-C3) office growth?

(iv) Under a citywide annual limit of 500,000 square feet per year, where is the development shifted? Under a 1 million gsf annual limit, to where is the development shifted?

P.1 B.1.1 B.2.2

24) Regarding the "forecasting" vs. the "list-based" methodologies: the list-based methodology is purported to be inaccurate because projects may often be dropped from the list. Over the past 5 years, which projects have been dropped from the list? What percentage of the total cumulative gsf on the list did those projects constitute?

B.1.4.7

25) Regarding the growth rates used in the EIR: Page IV.B.24 indicates that of the total of 9.87 million square feet of office space to be built by 1990, 7.6 million square feet has already been approved. Assuming a 3 year lag between approval and occupancy, this means that the EIR projects that the Planning Commission will approve just 9.87 − 7.6 = 2.3 million square feet of office development between now and the end of 1987 – or just 660,000 square feet per year in the C3. This seems extremely low, in light of recent approval rates of greater than 2.5 million square feet per year.

B.1.1

How is this projection reconciled with reality? What mechanism is proposed to ensure that the environmental impacts described in the "Plan" are kept to the levels described in the Draft EIR? Would the DCP stand behind the projections of this EIR by proposing and supporting a 660,000 square foot annual limit for the next 3½ years?

B.1.3
B.1.4.6
P.1

Similarly, the approval rate for 1988 and beyond must be approximately 840,000 square feet per year, based on the EIR's projections. Will the DCP propose and support an 840,000 square foot annual limit for 1988 and beyond to ensure that the extremely fragile demand-capacity balance discussed in the EIR is not upset?

B.1.4.6
P.1

(26) How much growth is projected for the industrial zone South of Market (pp. IV.B.56-58) for the periods 1984-1990 and 1990-2000? There is no discussion of projected (or even currently proposed) projects, including conversions, in the area. Please evaluate these quantities.

B.2

(27) Regarding Transfer of Development Rights: What is the total TDR supply (in square feet)? We contend that permitting a 1 for 1 transfer of development "rights" is an outrageous giveaway of public air rights. No developer would demolish a building with a FAR slightly below the legal maximum FAR, simply to replace it with a new building, only slightly larger, at the maximum FAR. On the contrary, as long as a building's FAR is greater than a critical percentage (x%)

of the maximum allowable FAR, there is no economic incentive to demolish the building. Therefore, at most, transferable development "rights" should be calculated based on the difference between the current FAR of the building and x% of the maximum allowable FAR. (The value of x should be obtainable from the economic analysis performed by the EIR consultant.)

(i) What is the typical (or average) value of x?

(ii) Under this scheme, what is the TDR supply (in gsf)?

(iii) If the maximum FAR's in all districts were reduced by 2:1, what would the TDR supply be under this scheme? (It is clear that reducing the maximum allowable FAR would reduce the pressure to demolish "smaller" buildings. Therefore, FAR reductions might be a very effective preservation mechanism.)

Lastly, if, in addition to the above approach, TDR's were awarded at a lower rate (e.g., 1 sq ft. transferable per 2 sq. ft. of unused development "rights", what quantitative impact would this have on the effectiveness of the TDR schemes?

C.2.2

(2) What does the methodology used in the Draft EIR indicate about the ability of small (less than 10 person) business operations vs. large office operations to stay in downtown San Francisco? What measures does the "Plan" propose to keep small businesses from being driven out by large, corporate office uses? We note that rents in older buildings are approximately 50-60% of those in new buildings. Perhaps a limit on new construction would have a very positive impact by encouraging smaller businesses to remain downtown, by preserving the supply of older, lower rent office space and limiting the amount of newer, high rent, large floor area office space

which is more attractive to large, corporate users) B.4.1 P.1

What Use Controls might be instituted as further mitigation measures to protect small businesses? B.4.1

(29) Why does the Downtown Plan itself talk about 22 million square feet of office growth by the year 2000, while the Downtown Plan EIR assumes 16.8 million? B.1.4.5

(30) Please quantify the "baseline" projections for non-C3 S.F. office growth for 1984-1990 and 1990-2000. Please compare to recent growth rates and project approval rates, and justify the projections B.2.1 E.1.5

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(31) The transportation analysis is entirely inadequate. It is based on arbitrarily assigned, ridiculously low growth rates, unvalidated models and unsubstantiated assumptions. These minimize the magnitude of the true impacts. The method of reporting the impacts covers them up further. E

As discussed in our comments on the employment growth methodology (above),

(i) no regional growth is factored into the base case loadings on regional transportation systems

(ii) most non-C3 growth impacts are improperly dealt with. (E.g., this major growth area is projected to add no additional traffic at all to the Bay Bridge.)

(iii) the actual recent C3 growth rate is not used in the baseline analysis.

All of these problems should be dealt with in the Final EIR. **B.1.1 E.1.1.1 E.1.5**

32) The transportation model: As was done with the forecasting methodology for growth, the EIR uses new, untested models for the prediction of changes in modal shares over time. These models, which produce substantially reduced estimates of environmental impacts vis-a-vis the use of established approaches, can be easily manipulated to produce whatever results the DCP desires. The assumptions, parameters, quantitative and qualitative relationships used to obtain the EIR's predictions of increased ridesharing and increased transit usage must be opened up to public scrutiny. The Downtown "Plan's" traffic and transit impacts are extremely sensitive to small changes in the modal splits, so much so that small, unsubstantiated or unjustified changes made to the measured modal split data can easily be used to cover up serious impacts on our highways and transit agencies. Therefore, we request the following information: **E.1**

(i) What data, quantitative relationships and assumptions lead to the predictions for changes in modal splits (i.e., more ridesharing and transit usage)? Is a qualitative model ever used? To what extent does the intuition (or prejudice) of the model user impact the results of the model? What quantitative empirical data exists to substantiate the model results? How was the model validated? Has it been used elsewhere? **E.1.2 E.1.4**

(ii) In other cities with ridesharing programs (e.g., Los Angeles), have congestion increases been stopped by those programs? Is there a correlation (quantitative) between the number of commuters who shift to carpooling and an increase in average commute time due to increased congestion? If so, what is the correlation? What is the range of the values of the parameters of the correlation? How do these parameters compare to those used in the EIR's model?

E.1.4

(iii) What is the sensitivity of the resulting modal splits to the range of parameters observed in other cities? When this range of parameters is used in the EIR's model, what is the range of modal splits obtained and what are the resulting ranges of environmental impacts?

E.1.4

(iv) How was the model used in the EIR validated? By backcasting? Please show the results. Have members of the professional/academic communities reviewed the model?

E.1.2

(v) We contend that it is extremely dangerous to simply "assume away" transportation system impacts through the use of optimistic mode shifting assumptions. Just as nuclear plants must be built to withstand the worst-case earthquake, rather than an "average" earthquake, a rational Downtown Plan should be analyzed using the most pessimistic assumptions, so that the plan and mitigation measures can be tailored to deal with the worst case impacts.

To do otherwise would be foolhardy and would violate the public trust. Therefore, we request that the EIR be revised to show the transportation impacts using analyses based on

(a) the existing modal splits; and

(b) the most conservative parameters which could reasonably be used within the model which quantifies modeshifting as a function of increased congestion.

For these analyses, please show all transportation network, transit system, parking and pollution impacts, both locally and regionally. The analyses should be done using the ranges of employment growth forecasts discussed earlier. They should incorporate regional growth and non-C3 growth, as described in these Comments. They should include the impact 'measures' (e.g. times of typical commute trips, etc) discussed in these Comments. They should include the mitigation measures and cost analyses requested in these Comments.

E.1
E.1.1
E.1.4

(vi) The transportation impacts are also quite sensitive to the assumptions regarding the residence patterns of future downtown employees. What would all of the impacts be using the present residence patterns? Please describe in detail and quantify the model used to project future residence patterns. How was it validated? Did it incorporate the housing impacts of other regional growth plans?

D.2.1
D.2.5
D.2.8
D.3.3.1
D.3.2.1
E.1.1.1

(vii) If the transportation analysis were conducted using the guidelines used in 1981 (residence patterns, pte's per 1000 gsf of office space, modal splits, etc.) what would the impacts be?

E.1.6

In summary, if a forecast-based model is to be used, it should be used to produce a range of forecasts based on the range of appropriate inputs. (Mitigation and the "official impacts" should, of course, be based on the worst-case scenarios.) If mode shift parameters are assumed to vary over time, this should be clearly documented. The models used to vary these parameters should be exposed to the public and validated.

Z.1

As the Draft EIR now stands, the mode shifts assumed may as well have been pulled out of thin air. There is no documentation or substantiation for the assumed shifts. We cannot accept impact analyses based on a "black box" model, particularly when the model outputs are so critical to the feasibility of the proposed Downtown "Plan." Unless adjustments to the modal split data can be clearly substantiated, there is no recourse but to use the existing modal split data. **E.1.4**

(33) The EIR states that the transportation model incorporated the effects of congestion on mode selection decisions. Please quantify these effects. Were the EIR's conclusions in this area based on the responses to the employee survey? How were the EIR's conclusions in this area validated?

E.1.4 E.1.2 E.4.1

(34) Please show, in a table, for 1984, 1990 and 2000 conditions, and for both the EIR's methodology and the measurement-based analysis mandated by CEQA

(i.e., 1981-vintage EIR analyses):

- total number of office workers
- total numbers of work and non-work ptc's
- work and non-work ptc's allocated to each region
- work and non-work ptc's allocated to each transit system
- automobile trips generated and vtc's allocated to each corridor and region (for work and non-work ptc's)
- vehicle occupancies for each region
- parking space demand (longterm, short-term)
- pollutants generated.

Please show this data for the peak hour, 2-hour peak period, and the new "extended" peak period required to clear capacity-constrained corridors of congestion.
Clearly document any reasons for changes between the two methodologies (forecast and measurement-based). **E.1.4.2. E.1.6 E.1.6.1 I**
E.4

The data requested above is essential to permit a public comparison and evaluation of the two methodologies. **Z.1**

(5) Regarding air quality impacts: what is the cost of removal of the additional emissions which would be generated by cumulative development (based on the most cost-effective pollution tradeoffs available). This should be the standard used for the imposition of air pollution mitigation measures on development. Please include such measures in the EIR and Downtown Plan. **I.7**

(36) The EIR does not describe the transportation impacts in a framework useful or comprehensible to the average citizen. Since highways cannot operate beyond their capacities, the approach of describing highway conditions by Levels of Service alone is inadequate. E.g., even within Level of Service F, there is a wide range of flow conditions (30 mph average flow, 10 mph average flow, etc.) Some attempt must be made in the EIR to convey the real meaning of the transportation impacts. **E.3.1**

An example of the problem:

- Despite a 51% projected increase in the number of East Bay commuters, Bay Bridge peak hour traffic is projected to increase by just 1%.
- Despite a 50% projected increase in North Bay commuters, traffic on North Bay corridors is projected to increase by just 6%.

Why? **E.1.5 E.3.1**

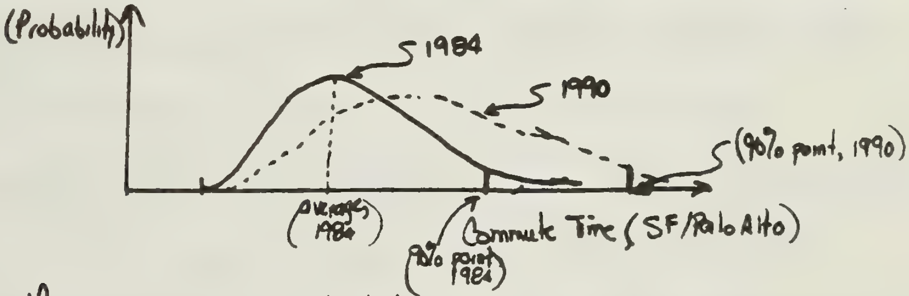
(i) the EIR assumes (arbitrarily) an increase in transit usage and ride-sharing. We have addressed this issue in earlier comments. Regardless of how much mode-shifting might occur, however, the assumption that traffic will not get substantially worse than today is a poor one. Traffic in the Los Angeles basin continues to worsen with new development, even though freeways there have been "at capacity" for years. In New York City, which possesses a transit system far superior to anything which the Bay Area will ever have, traffic congestion is worse than here. Is it foolish (or simply elitist) to assume that Bay Area residents are a better breed of people? **E.1.4**

(ii) The peak period will be stretched out further. How much? The EIR doesn't say. **E.1.4.2**

(iii) The EIR's "explanation" that "congestion effects" will encourage more carpooling explains very little. "Congestion effects", "excess demand" and "temporary flow interruptions" convey very little information about the real situation. **E.1.4** **E.4.1**

Better measures of transportation impacts must be used. Among them: **E.1.4**

(i) increases in commute times, both into and out of San Francisco, for "typical" commutes on highways (e.g. - Berkeley/SF, SF/Palo Alto). This data must include "bad" days as well as "average" days. (Because it is quite likely that the distribution of commute times for a given commute has a probability density of the nature:



then the "average" commute time is not a sufficient indicator of the impact. Perhaps the commute time associated with the .9 probability on the cumulative distribution function would be a better indicator.) **E.1.4**

(ii) increases in the duration of the peak period

(iii) average freeway speeds (and distribution) for each traffic corridor

(iv) length, duration and average delay for traffic backups at toll plazas, streets (e.g., Doyle Drive) and freeways

(v) amount of traffic which will be diverted from beyond-capacity freeways to local streets (e.g., Geary Blvd or the "abundance of surface routes parallel to US 101" - i.e., neighborhood streets)

E.1.4 E.1.4.2.
E.3.2 E.3.1

Please compare the congestion measures for all alternatives, for the requested growth rate projection and transportation assumptions. How do these results compare to 1981 conditions? E.1.4

In short, we can all clearly see that conditions on the roads have been deteriorating over the past few years. Traffic now crawls where it used to flow. Yet the EIR's discussions do not address these issues adequately. E.3.1

(37) What are the impacts on US 101 north of the I-280 intersection? E.3.1

(38) Regarding transportation mitigation: determine what it would cost to bring traffic conditions back to present day (or 1981) levels. (For example, what subsidization of transit fares would persuade a sufficient number of motorists to stay off the roads?) This is a measure of the minimum cost of transportation system mitigation (highway component) which should be imposed on development. E.6

Please develop such measures for the Plan and the Final EIR. **E.6**

(39) Appendix J, page 4: the diagram doesn't seem to make sense. Why are both branches of the tree apparently identical? **E.1.1**

(40) Page J.3: states that historic trends have been used for non-C3 travel analysis. Please state what growth rates for non-C3 development (employees/year, gsf/year) have been used. How does this compare to the rate of project approvals plus conversions over the past two years? What is the total increase in non-C3 employment and office space (for each alternative) for 1984-2000? **E.1.5**

41) Page J.25: the explanation of non-C3 impacts on Golden Gate Transit, CalTrain, SamTrans and BART is extremely vague. The EIR should have a table showing base ridership and ridership demand increases for all carriers (and all transportation corridors) for the non-C3 growth, for 1981, 1984, 1990 and 20

E.1.5 E.2.3 E.2.4 E.2.5 E.2.6

4.) Page IV.E.13 discusses the "abundance of surface routes" that will allow new downtown traffic to bypass the US101/I280 interchange. The impacts of downtown traffic growth on these streets should be quantified and discussed in much greater detail. **E.3.2 E.3.1**

43) Page IV.E.25: Please break down auto use and BART use figures by corridor. What are the modal splits by corridor? **E.1**
Why are there no non-work pte's on either AC Transit or SamTrans?

(44) Page IV.E.26: Non-C3 growth is, once again, discussed in very vague terms. What are "historic growth trends"? What is the total projected employment growth? What is the increase in transit riders (for each agency) and vehicles (for each corridor)?

E.1.5

(45) The analysis of transit impacts should be redone, based on the revised and expanded transportation analyses discussed earlier in these Comments. It should be based on measurements, not "goals". It should not be based on allocations-by-agency which are done to make the numbers work out nicely, as appears to have been done in the Draft EIR.

E.1.4.1

For instance, the conclusion that because AC Transit plans no capacity increases, all new transit demand to the East Bay will be picked up by BART (which will be operating at Service Level E-F while AC Transit presumably glides along at Service Level D) is not supportable. Why would East Bay passengers prefer to ride BART (at passenger-to seat ratio 1.42 instead of AC Transit (P/S = 1.08)? Why, despite a 22% increase in the number of East Bay commuters between 1990 and 2000, does AC Transit carry not one single additional passenger?

E.2.3
E.2.4

(46) The appropriate base case should be used for describing the impacts on transit agencies. As page IV.E.27 points out, transit agency plans are designed not simply to keep pace with new growth, but also to bring service levels up to targeted levels. The Draft EIR analysis, however, simply steals whatever portion of the capacity increases it desires in order to claim that S.F. growth can be accommodated. Thus, the

service improvements which we all pay for and wait for never materialize.

E.2 E.2.3

The appropriate base case, from which service level changes due to SF growth can be honestly measured, is one in which

(i) future non-SF growth has been included

(ii) the portion of transit agency expansion programs necessary to achieve targeted service levels has been applied.

The impact of SF growth (both C3 and non C3) is then measured by adding to the base case the demand created by SF development, and (then) applying any remaining portions of the agency's expansion plans.

E.1.5 E.2.1.3

47) The (capacity) costs of SF development to transit agencies - the costs which should be mitigated by the Downtown "Plan" - are composed of two terms. They are the costs of the capacity increases applied in step (ii) of Comment 46, plus the additional cost required to bring the agencies' service levels back to the level calculated in step (i) of Comment 46.

E.2.1.2

We request that the EIR perform the requested cost analyses and propose (and impose) a mitigation package to recover the identified costs.

E.2.1.2

48) Regarding transit agency expansion plans and capacities: these are very vaguely described. The EIR should provide a table showing each agency's capacity (seats) and demand, for each year analyzed. How much of each agency's capacity increase is realistically funded? The EIR's optimistic

funding assumptions are expedient but dangerous. What would each agency's capacity (and Level of Service) be if the level of federal and state transit support were 50% of that assumed in the EIR? What are the costs associated with the assumed capacity increases?

E.1.4.1 E.2.1.1 E.2.1.2 E.2.7.1

(49) What does each transit agency estimate to be the cost to serve each additional passenger generated by S.F. growth (assuming no decline in Level of Service)? This cost should be the total additional operating cost plus annualized additional capital cost to meet the total additional load imposed by SF development (and assuming no additional capital or operating subsidies), divided by the total number of additional peak hour passengers.

E.2.7.1

(50) Using a methodology similar to that described in comment 49, what does Caltrans estimate as the cost to accommodate additional commuter vehicles to San Francisco, keeping the Levels of Service on the highways at 1984 levels?

E.3.3

(51) What is the cost of the proposed I-80/580 HOV system discussed on page IV.E.30? The August 21, 1983 San Francisco Chronicle quoted $165 million for I-80 improvement to deal with new congestion. What portion of that is attributable to SF growth? How much will regional highway improvements made to service SF growth cost?

E.3.3

(52) How much will Muni operations be affected by congestion? Estimate increased time per run and increased costs. Are congestion-related slowdowns

factored into the Level of Service calculations? If not, please include them. E.2.1.2 E.2.2.3

(53) Are transit capacities and service levels based on scheduled capacity or actual (average) runs? If actual runs are not used, the capacities and service levels should be discounted to include this factor. E.2.2

(54) Page II.E.9 acknowledges that the aggregate Level of Services figures for each transit agency may be over-optimistic, since seats cannot be provided on lines solely on the basis of demand. (I.e., minimum headway considerations and minimum service levels along routes also dictate scheduling.) If the Level of Service for each line is weighted by the number of passengers allocated to that line, the resulting weighted average Level of Service would yield a much truer picture of the impacts experienced by riders. How do these weighted Level of Service figures compare to the Level of Service figures quoted in the EIR (for 1981 and 1984)? E.2.2

(55) The EIR doesn't even mention the City's Touche-Ross transit development fee study, which documented $9.82 per square foot of development as the fee necessary to recover just a portion of total additional Muni costs associated with new downtown development. The EIR should incorporate this information. E.2.7.2

(56) Under the forecasting methodology proposed in this EIR, the additional transit ridership generated per square foot of office space is no longer a directly measurable quantity. Please calculate, for the time frames of interest (1981-1984, 1984-1990, 1990-2000), for each transit agency,

(i) the net increase in ridership on each transit agency;

(ii) the net increase in downtown development, in "office space equivalents" (if a square foot of retail development generates x% as many peak period transit riders as a square foot of office development, its "office space equivalency would be x/100);

(iii) the ratio of these two quantities. (Call this the "effective office-transit generation rate"

Please compare the "effective office-transit generation rates" for each transit agency to the peak period transit ridership generation rates [redacted] for office space used in EIRs which are based on the list/measurement methodologies. **E.1.6.1**

For the Muni in particular, the ratio of these two rates can be used to roughly determine the transit development fee required to recover the cost elements addressed by the Touche-Ross methodology: it is $9.82 per square foot, multiplied by this ratio of the two rates. What is the resulting fee?

(To the extent that new development is assumed to create congestion which results in the entire downtown work force changing its modal preference, that development is responsible for the impacts of that [redacted] shift's entire impact on transit agencies. This is what the "effective office-transit generation rates" are intended to gauge.) **E.1.6.1**

(57) The DCP's Downtown Transportation Improvement Program - Working Paper 1 (May, 1982) points out that the worst case transportation impacts have been identified as occurring during the a.m. peak periods (page 5). Why then, is the p.m. peak period used in the Downtown Plan EIR

analyses? This seems inconsistent with the need for worst case transit planning. **E.1.3**

(58) Working Paper 1 estimates (page 10) AC Transit peak period seating capacity to be at load factor 1.05 over the 3-hour, 5:30-8:30 a.m. period. Yet the Downtown Plan EIR (p. IV.E.29) estimates the 1981 peak hour load factor to be 0.88 and the 1984 load factor to be 0.87. This indicates a tremendous inconsistency (since, if anything, the 2-hour am peak period load factor must be even greater than the 3 hour a.m. peak period load factor) between these two studies, or else indicates that the a.m. vs. p.m. situations are indeed quite different and points to the need for an a.m. peak period analysis in the EIR. Please comment on this problem **E.2.4**

59) Working Paper 1 (p.9) states that "Muni considers its downtown lines to be operating at or over capacity during the a.m. and p.m. one hour peaks; capacity is considered to be a load factor average of 1.5 times the number of seats;" i.e. the P/S ratio must be greater than 1.5. Yet the Plan EIR (page IV.E.29) estimates Muni's 1981 P/S ratio at 0.98-1.34 (what *is* the system's weighted average?) and its 1984 P/S ratio at 1.06-1.45. Both of these are lower than the 1982 Working Paper 1 figure. Please explain the discrepancy. **E.2.2.2**

0) Please incorporate in the Final EIR a table similar to Table J.4 (p. J.12), but based on the use of present-day modal split data. This is important for comparison of the proposed transportation methodology and the existing method. **E.1.4**

(61) On page IV.E.34: Why, when transportation corridors are claimed to be operating beyond capacity, is it presumed that their Levels of Service would be Level E and not Level F? (Since there is "excess travel demand" the highways should be at Volume/Capacity ratios greater than 1.0.) **E.3.1**

62) Even under the EIR's assumptions, a 6000 space parking deficit would occur by the year 2000 - and that is without incorporating any non-C3 growth.

(i) The EIR should explain this deficit: that it is equivalent to a bumper-to-bumper string of cars stretching from San Francisco to San Leandro.

(ii) The EIR should recalculate the deficit using the requested growth rates and existing transportation model splits.

(iii) The EIR should define the mitigation measures necessary to eliminate the deficits associated with C3 and non-C3 development.

(iv) The EIR should address associated issues - the additional inconvenience forced upon present downtown workers who may presently drive to work regularly or occasionally, and who, in the future, will have to adjust their lives to accommodate to problems created by future development, etc.

(v) The EIR should discuss the impacts of enormous parking deficits on parking rates and residential preferential parking. **E.1.1.1**
E.4.1 E.4.2

(63) The parking demand figures on p. IV.E.17 do not seem consistent with the data in Table J.4. That table shows for 1981, 42,170 work vte's. Assuming that these vehicles

require 1 space each and that short-term parking demand represents "about 25% of the equivalent daily demand" (p. IV.E.17), the total parking demand, from C3 district alone, equals (42,170)(4/3) = 59,200 spaces, not 43,000, for a net deficit of 12,200 spaces. Please explain this. Also note that this concern carries forward to the 1984, 1990 and 2000 analyses (pp. II.E.40-41).

E.4

(64) Page IV.E.18 states that 1000 net new parking spaces would be added through 1981-1984. Please determine what actually occurred during this period. **E.4**

(65) What are the additional parking impacts due to non-C3 growth?
What are the impacts and deficits without mode-shifting assumptions?
What will be the projected impacts on parking rates? **E.1.5 E.1.4 E.4**

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(66) Employment forecasts need to be broken down by skill, educational requirements and entry-level/non-entry level categories for 1984, 1990 and 2000, for each Alternative. A blue collar/white collar split can be approximated by using the data in the tables on pages II.C.2 and IV.C.15. (We estimate that approximately 28% of the present C3 district jobs are "blue collar", but that less than 11% of the net increase in downtown jobs will be blue collar, and that most of this quantity will be in the tourism and retail sectors.)

B.5.1

(67) The skills and job needs of present and future S.F. residents must be quantified through a labor pool analysis. Unless this is done, there will be no way to compare the supposed benefits of the various growth alternatives, nor will there be any way to put together

a plan or mitigation measures which will create the types of job opportunities needed by unemployed City residents. This analysis will also be critical in determining whether there are, in fact, overriding considerations (jobs for unemployed residents) which might possibly justify the approval of a Downtown "Plan" with such horrendous transportation and housing impacts. B.5.1 B.5.2 B.5.3

A labor pool analysis might indicate that a downtown plan should focus on controlling office development through an annual limit (since that development is acknowledged to create pressures leading to the loss of blue collar employment) while encouraging more retail, hotel or industrial sector development. Inclusion of a labor pool analysis in the EIR is central to the development of an appropriate downtown zoning plan. We continue to request that DCP develop such an analysis for this EIR.

B.5.2 B.5.3

3) What are the Downtown "Plan's" effects on the loss of blue collar jobs in the South of Market industrial zones? There is a very real possibility that the office sector expansion associated with the "Plan" would, through displacement of jobs in the non-C3 areas of SF, result in a net loss of blue-collar jobs (i.e., blue collar jobs created by office sector expansion are less than blue collar jobs driven out by forces unleashed by this expansion). Please quantify this impact to the maximum possible extent (through DCP's land use model, employer surveys, etc.)

B.4.1 B.5.1

(69) How can the assumption be made (page V.D.9 of the Consultant's Report) that 30% of net new job growth will go to SF residents, when this figure has historically been 11%? This is a particularly astounding assumption, since without a labor pool

analysis, there is no way to match job opportunities to job skills of City residents.

B.5.2

B.5.3

10) The housing analysis is extremely flawed:

- The unjustified assumptions regarding future housing construction in San Francisco both overestimate that development and understate the "Plan's" regional housing and transportation impacts.
- Non-C3 growth's impact should be included in the analysis on an equal footing with C3 growth's housing impacts, as future C3 and non-C3 growth are of the same order of magnitude.
- The housing shortfall should be shown for each Alternative studied.
- The housing impacts on the rest of the region - particularly in the moderate cost rental unit sector - should be quantified.
- Rental housing issues are not even addressed. The shortfall in rental units, citywide and regionally, should be quantified.

Our criticisms of the use of the forecast methodology and requests for expanded ranges of studies, addressed in our earlier comments, also hold with respect to the housing analysis.

D.2.2 D.2.5 D.3.1 D.3.2.3 D.3.3.2
D.3.3.5 D.3.3.6
D.4

11) Please quantify the EIR's assumptions regarding regional housing availability and its impacts on the residence patterns of future SF workers. Did they take into account housing demand due to regional commercial development? Did they include rental housing and affordability considerations? How were the assumptions validated?

D.2.3 D.2.5 D.2.6 D.2.8 D.3.2.1 D.4

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(12) How many new commuters are assumed to live in each area of the region? Please compare this to the new housing stock in those regions (after it has been adjusted for demands placed on that stock by growth in other areas of the region). Specifically discuss rental housing in this analysis.

D.2.7
D.3.2.1
D.3.2.3

(13) Regarding Master Plan Residence Element Objectives 5 and 9 (points 41 through 44 on pages IV. A. 15-16): The EIR should note that the proposed Downtown "Plan" in fact conflicts with those elements, rather than simply state that the "Plan" makes "No recommendations." Also, Objective 1 (page IV. A. 15) is clearly contradicted by the "Plan", which provides no plan to create new housing "for all income groups". (The EIR never discusses rental housing. Page IV.A.21 states that "the Downtown Plan does not address housing affordability." Yet the EIR tries to give the impression of consistency with Objective 1.)

A.2 D.3.3.6

(14) Regarding mitigation measures: Most of the "mitigation measures" proposed are non-substantive, unfunded, or beyond the ability of the Planning Commission to implement. They do not constitute mitigation. In addition to measures requested earlier in these Comments, we request that the following mitigation measures be addressed and applied:

(i) For regional transit agencies: the downtown development fee should be extended to pay for the additional costs incurred by all regional transit agencies in serving downtown and non-C3 SF expansion. The fee could be collected by SF and distributed to regional carriers by MTC.

E.2.7.2

(ii) A downtown development district should be established to pay for the full costs of projects which are clearly necessitated by downtown growth – e.g., the Metro turnaround and the SP extension. The approval of a Downtown Plan should be made contingent upon the establishment of such a district by the City or by downtown property owners. **E.2.7.3**

(iii) Increase the existing transit development fee to cover the full cost of impacts on the Muni. **E.2.7.2**

(iv) For housing mitigation:

- reduce the "Plan's" base FARs, and award discretionary FAR bonuses for the construction of rental housing in the C3 area;
- rezone the western South of Market C3 district from C3 to RC, as outlined in the SPUR South of Market Plan.
- impose the SFRG housing requirement of Alternative 4.

B.4.2
D.5 D.5.4

(v) For job-related mitigation:

- require that developers contribute to a city-run job training program
- reduce the "Plan's" base FARs, and award discretionary FAR bonuses for the establishment of job training programs and for commitment to "First Source" and local hiring plans.

B.5.5

(vi) For retention of small business and industry:

- reduce FARs to encourage the retention of older, lower-cost office space most suitable for small businesses.
- rezone portions of the South of Market C3 zone to protect industrial uses from office expansion.
- tie approval of the "Plan" to zoning changes prohibiting office expansion outside the C3 district. **B.4.1 Y.2**

(vii) For historic preservation: reduce base and maximum FARs, as discussed earlier. Reduction in base FARs would maintain the demand for TDRs. Reduction in maximum FARs would reduce the incentive to destroy historic buildings.

C.2.2

(75) Many of the "mitigation measures" for transit are not mitigation measures at all!! They are proposals that someone else somehow pay for the implementation of transit increases which are already assumed to be ~~[illegible]~~ implemented in the impact analyses! (E.g., measure 3 on page V.E.5, measure 2 on V.E.4, measure 5 on V.E.6, measure 13 on pages V.E. 10 - 12,..). If the measures are indeed mitigations, then the capacity increases associated with them should not have been assumed in the impact analyses.

What is the cost for each of these measures? **E.2.7.4**
E.6

(76) What is the cost of mitigation measure 14 (p. V.E.12)? **E.3.3**

(77) "Job training" is broadly discussed as a mitigation on page V.C.5. But no concrete measures are proposed. Why not? **B.5.5**

(78) Regarding the annual limit as a mitigation measure:

- despite the clearly biased interpretations of the annual limit in Section V (most of the "objections" pointed out could be eliminated through simple mechanisms), the fact remains that it is the only effective and guaranteed method which can:
  - (i) reduce the transit, transportation, housing, pollution, parking, small business, industry and blue-collar job displacement impacts associated with the Downtown "Plan".
  - (ii) guarantee that the impacts projected using the extremely crude and unsubstantiated employment forecast and transportation forecast methodologies stay within the ranges discussed in the EIR.

Since most transportation systems are acknowledged to be at their critical capacity levels, the second point's importance cannot be over-stressed.

The EIR's analysis should be directed at finding ways to make the concept of the annual limit work, rather than ways to tear it apart.

B.4 D.5
E.6.1 P.1

For example, Table V.E.1 (page V.E.3) purports to show the miniscule impacts of a 500,000 square foot annual limit. The reporting format of the Table is not clear, but it certainly seems counter-intuitive that a citywide 500,000 square foot annual limit would reduce transportation impacts by just 8% in the year 2000. (The implication seems to be that the citywide growth rate without the limit would be just 550,000 square feet per year?) The table needs some clarification and explanation, in any case.

E.6.1 P.1

Please re-analyze and summarize the impacts of a citywide annual limit which includes the minor tuning and enhancements required for its practical application. (I.e., give some thought as to how a well-designed limit might work.)

E.6.1 P.1

(79) Regarding the "no new growth" alternative (p. VII.5): What would the transit and transportation system loadings in 1990 and 2000 be in this case?

E.2.1.3 Q.1

(80) Referring to page VI.1 (Significant Environmental Effects): the impact analyses performed in the Draft EIR, as crude as it may be, indicates that even with mitigation measures, transportation effects would be significant. Use of "otherwise" significant in the first paragraph is incorrect.

E.7

1) In concluding, we note that the Department of City Planning has succeeded in developing a methodology for impact analysis which hides from public view the myriad of assumptions, machinations and manipulations of data used to produce an EIR for the most significant "project" in recent years.

R

The validity of the model is unproven. Any desired results could conceivably be output through the use of suitable inputs. This points out the urgent necessity to apply constraints to ensure that the impacts which might occur do not exceed those predicted by the model.

B.1.3 D.2.8 E.1.2

I.e. - if the Department of City Planning truly believes in the validity of the model, then it should demonstrate its faith by imposing appropriate annual growth limits in tandem with the proposed Downtown "Plan."

P.1

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CARL MFARATC

JUN 4 1984

June 30, 1983

To: San Francisco City Planning Commission
Re: SFRG Comments on Downtown EIR Consultant's Report

Honorable Commissioners:

SFRG thanks the Planning Commission for the opportunity to comment on the Downtown EIR Consultant's Report. In the interest of brevity, these comments will not focus on the criticism of minor details; they will not cover areas discussed by David Jones of SFRG (and should therefore be considered complementary to his comments); and will not even focus on the issue that the Consultant's Report shows that the SFRG Alternative (Alternative 4) is clearly superior to all of the other alternatives analyzed in every relevant category. **Z.1**

Instead, these comments will concentrate on the largest flaws in the Report - the methodological flaws which compromise the integrity and the value of the entire Report. The major problems with the Consultant's Report fall into three categories:

- failure to look at the entire picture of downtown development;
- failure to address the real issues pertaining to San Franciscans' job needs and housing needs; and
- failure to comprehend and to convey the impacts of downtown expansion on the transportation sector, both locally and regionally.

There is no excuse for the Downtown EIR to fail to deal with these issues fully and clearly. The basic data exists which should allow these issues to be addressed - if this Commission really wants an honest and meaningful document to be produced. **B.1.1 B.2.1 B.5.1 B.5.2 D.3.1 D.4 D.5 R N.3**

Inadequate Treatment of the Total Amount of Downtown Office Growth

The greatest flaw in the Consultant's Report is its tunnel vision - its failure to look at all of the development planned for the downtown area. The arbitrary line drawn at the edge of the C3 district leaves out development which is planned for the outer South of Market industrial zone, China Basin and the Van Ness corridor; it arbitrarily ignores half of the growth which may occur in the next 15 years. **B.2.2**

This Commission is aware of all of the office projects and warehouse conversions which are planned for the M (industrial) zone. This Commission knows all about the 16 million square feet proposed for China Basin. But the Consultant's Report pretends that all of that office growth doesn't exist. **B.2.2**

The estimates for office growth used in this Report are ridiculously low: from 1984-2000, just 1.6 million square feet per year - a total of 24.4 million square feet. This Commission's own EIRs acknowledge that 18 million square feet of development are already in the pipeline, not including Southern Pacific's proposed 16 million square feet (a total of 34 million square feet already). The Mayor's State of the City Address discussed more than 24 million square feet of office development two years ago. SFRG's list of office development projects shows approximately 50 million square feet of office growth. And that doesn't even include whatever projects will certainly be proposed between now and 1995! **B.1.2**

In the 1980's, the office space approval rate has been well over 3 million square feet per year. This Commission approved more than 6 million square feet of office development last year alone. So it is absurd to postulate and study an annual growth rate of just 1.6 million square feet of growth, as this Report does. It is wrong to ignore half of the likely development, just because it is outside the present day boundaries of the C3 district - a district which you are de facto expanding by your weekly approvals of office projects in the outer South of Market area. It is unjustifiable for this Report to use the 1.6 million square foot annual growth rate of the early 1970's, however much we wish that could be the case. **B.1.2**

Since this Report leaves out half of the probable growth, it also leaves out half of the probable impacts. And the Report ignores the worst half of the impacts: Maybe BART can expand its capacity by 87%, as the Report claims. Maybe carpooling will limit traffic increases on the Golden Gate Bridge to 8%, despite a 38% downtown population increase, as the Report assumes. But the second half of the growth - the half that's not studied - the next 100,000 commuters - that won't be dealt with so "easily". A 75% increase - not a 38% increase - in downtown commuters is what will really have to be dealt with. But that reality is not expressed in this Consultant's Report. **B.1 B.1.2 B.2.1 E.2.3. E.1.1 E.1.4 E.2.1 E.3.1**

The Downtown EIR was specifically supposed to study office growth in the C2 and M zones outside the C3, as well as the C3, because those areas are part of the new downtown which this Commission is defining every week through its project approvals. Rather than belabor the point any further, we point out that, for now, Commissioners can compensate somewhat for the fact that the Report looks at only half the picture by speeding up the doomsday dates: 1990 will arrive in 1987; and wherever the Report mentions the year 2000, substitute 1993. **B.1 B.2.1**

A second major deficiency which further undermines the perception of the downtown expansion problem is the use of 1990 as a pseudo-base year in all of the tables in the Report. SFRG realizes that, because the Commission has allowed downtown expansion to get completely out of control, that the Commission may have little say over what happens before 1990. But, nonetheless, throughout the Report, tables should be incorporated which clearly show the total increases in demands, autos, transit capacity, etc. for the period 1984-2000. The present, myopic reporting format used in the Report minimizes the reader's perception of all of the impacts. Nowhere does one see that, under Alternative 1, for example, 1984-2000 office growth would be 39%; or that even under the SFRG Alternative, there would be a 24% increase in downtown office space. (And again, because the outer South of Market, etc. are not considered and artificially low growth rates are assumed, even that is just half the picture!) The largest number one finds in the Report is 23% (for Alternative 1). **B.1.1**

Nowhere does one see that, under Alternative 1, the total 1984-2000 increase in downtown office workers is 106,000 (a 38% increase), or that a full 43% of the blue collar employment in the C3 district would be lost. (And again, that's just half the picture!) Or that the increase in Muni demand would not be just 13% (1990-2000), but 26% over 1984-2000. (And that's just half the picture!) The split of 1984-2000 impacts into two periods, 1984-1990 and 1990-2000, is very deceptive to the casual reader. Tables for 1984-2000 should be added throughout the Report in order to make it totally clear to the reader just how much the situation in the year 2000 would differ from TODAY, not 1990. **B.1.1 E.1.1**

Inadequate Treatment of the REAL "Jobs" Issue

On the issue of Employment Impacts: SFRG is pleased to be clearly vindicated by the Consultant's Report. For years, SFRG has argued before this Commission that just 14% of San Francisco's employment growth would directly benefit present City residents. Yet project EIRs kept placing the figure at approximately 40%, as an excuse for claiming that there are over-riding considerations which justify project approvals in spite of the massive cumulative environmental impacts. But the Consultant's Report clearly shows (on page V.D.9) that, for 1970-1980, the increase in the number of San Francisco residents employed in San Francisco was just 11% of the increase in the number of jobs in San Francisco. (Of course, the Report then goes on to speculate that 30% of the future job growth will benefit City residents (Appendix I.29), which is a very questionable assumption that should be clearly justified - if indeed that is possible - in the Final Downtown EIR.) **B.5.3**

Just 11% - just 9,600 out of 84,000 jobs - benefited San Francisco residents, while 75,000 jobs went to commuters! The Real Question is WHY? And, of course, the answer to that question - the most crucial jobs-related question - is to be found in an analysis of the job skills of the City's unemployed. Such an analysis would show that those skills do not match those which are required in the downtown office jobs which are being created. During the Downtown EIR Scoping Study, SFRG repeatedly requested that a survey and analysis be done to determine how many jobs, and what types of jobs, the City's residents need and will need in the future. We noted the need for a survey of the skills of San Francisco's unemployed, and for a study of the numbers of residents coming out of the City's schools over the next 10-15 years, along with their skills. This is critically important data, because a new downtown plan must be judged and shaped on the basis of the type of jobs needed by City residents. (E.g., note that the SFRG Alternative would provide the most opportunities to craftspersons, operators and laborers - pp. V.C.36,39.) **B.5.2 B.5.3**

A labor pool analysis is also important in order to determine what type of mitigation measures should be developed in order to ensure that City residents obtain a larger share of the new jobs created downtown. But, the issue of San Francisco's labor pool and the skills of that labor pool is completely avoided in the Consultant's Report. **B.5.2**

(A further "jobs" issue: the tunnel vision which characterizes this Report, by limiting the study to the C3 area, also leads to a total lack of analysis or discussion of the displacement of blue collar industrial uses in the South of Market area, an issue which is extremely important and very, very relevant.) **B.4.1**

Inadequate Treatment of the Fundamental Housing Issues

Despite pages and pages of discussion of housing impacts, the BIG QUESTIONS are not answered in the Consultant's Report. In fact, the BIG QUESTIONS are not even asked!

How many units are needed to balance the demand created by office **Z.1** growth, under each of the 5 alternatives? What would be the imbalance in the year 2000, under each of the alternatives? What types of units are needed? (74% of San Francisco's C3 workers are renters. Yet there is no discussion whatsoever of the need for rental units, let alone a quantification of that need.) **D.2 D.3.3.6 D.4**

Inadequacy of the Transportation Impact Analysis

Because the transportation methodology is so narrowly focused, it cannot even pose the right questions, let alone provide the right answers. The basic problem is that the methodology seems to be incapable of saying anything about what happens when transportation corridors and transit systems reach their capacities and continued growth attempts to push them beyond those capacities. **E.1.7**

In spite of the fact that half of the downtown growth is left out of the analysis in this Report, and in spite of the fact that the peak hour impacts are further manipulated and diluted in this analysis by subtly assuming a longer and longer pm peak traffic period, the Report still shows that all transportation corridors reach their peak capacities in a few years. What happens next? Apparently, not much. The bridges are at capacity - things can't get any worse - or so the Report leads one to believe. Are there any discussions of backups at on-ramps or toll plazas or two-hour traffic jams? No. Is there any discussion of how traffic piling up at Mission and Beale and then spilling acrosss Mission and Market Streets will affect the Muni? No. **E.1.7 E.3.1 E.2.2.3**

The consequences of exceeding various transportation corridor capacity limits are simply not discussed. For example, the Report claims that, in 1984, the Bay Bridge would be at 94% of capacity - 8400 vehicles/hour. In 1990, despite a 14% growth in person trip ends, the Bridge would still be at 94% of capacity - 8400 vehicles/hour. Then, in 2000, Bridge flow would be

9370 vehicles/hour - beyond capacity. Why is it that, despite growth during the 80's, no additional cars cross the bridge? Was traffic so bad that people were forced into other transportation modes? If that's so, then what happened between 1990-2000 to force another 1000 vehicles/hour onto the bridge during the 1990's? What does that do to the commute time into San Francisco? What does that do to AC Transit service? These issues are not addressed. (The situation must get pretty bad, because for 1990-2000, in spite of more than 27,000 additional East Bay commuters, AC Transit ridership is actually projected to drop by ½% (for 3 of the alternatives), while Bart ridership increases by 43%! Are people abandoning AC Transit because the buses can't move across the bridge in the jammed traffic?) **E.1.4.2 E.2.4 E.3.1 E.4.1**

Similarly, isn't it strange that there is no increase in Golden Gate Bridge traffic between 1984 and 1990; and that then, by 2000, the increase would be just under 600 vehicles/hour (only 8% increase!) - right up to, but not beyond, the Bridge's capacity? No explanation is given. And there is no discussion of what happens to the commute times, the delays experienced by commuters, or the impacts of all that congestion flowing through the Marina and the Richmond. How far do the lines of jammed traffic back up in the City every night? **E.1.4.2 E.3.1 E.3.2**

Is flextime supposed to solve the problems? We think not - because the 1984 base starts out with 280,000 people downtown, but only 135,000 commute trips during the peak hour - i.e., in 1984, the commute trips are already spread out over a two hour rush hour. Flextime certainly can't stretch things out much beyond that. So what is supposed to happen by 2000? With 34% more person trip ends, how long will the delays be? (Again, remember that the Transportation scenario in the Report considers only half of the growth which will probably occur without substantive new controls!) **E.6**

Parking:

According to the Consultant's Report, 11,000 new parking spaces will be created along with the next 24.4 million square feet of office growth. When was the last time this Commission approved an office building with a 300 car garage? All we've seen over the past years have been reductions in the number of parking spaces as parking lots are used as building sites. And, according to the Report, new parking demand will effectively be only 0.71 spaces per 1000 square feet of office development in the 1980's, and 0.44 spaces per 1000 square feet in the 1990's. Yet recent EIRs have used figures of 1.0 - 1.5 spaces per 1000 square feet. Are these figures being reduced to whitewash the impacts? And if not, what cataclysm will have occurred to cause the parking demand per commuter to drop? And, even with these low demand figures, the demand - for 15,600 more spaces - would still be much greater than the 11,000 new spaces presumably created. So what will happen to parking in the neighborhoods? Will the entire City be one preferential parking district? (And again, the scenario analyzed is just half of the picture!) **E.4**

Some questions on Transit issues:

Why does Muni, despite a 38% downtown employment increase - have a ridership increase of just 26%? (P. V.E.12). (And, again, that's just half the picture.) **E.1.2**

Golden Gate Transit will have to deal with a 114% ridership increase by 2000; Bart: a 79% increase. (And that's just half the picture.) The Consultant's Report simply says (p. V.E.11) that - don't worry - ridership will still be less than total capacity. If that is so, the Report should detail the planned capacity increases. And who will pay for these increases? **E.2.1.2** **E.2.3** **E.2.5** **E.2.7.4**

AC Transit, in 1984, is projected to carry 7,710 pm peak hour C3 passengers (p. IV.E.6) plus 950 more passengers whose trips originate in the rest of the City (total of 8,660, p.IV.E.9). In the 1990 scenario, those extra passengers - 10% of the demand - have disappeared from the analysis (pp. V.E.2, V.E.4). This point should be clarified. **E.2.4**

Golden Gate Transit: The Report shows that, in 1984, there would be 5,980 passengers boarding GGT in the C3 district (p. IV.E.6). But only 4,180 passengers apparently make it alive to the Golden Gate Bridge Toll Plaza (p. IV.E.9). Why? By 1990, there is a 24% increase (to 7,390 - p. V.E.2) in passengers boarding in C3, but a 60% increase (to 7,190 - p. V.E.4) in passengers arriving at the Toll Plaza. Why? **E.2.5**

Rather than go on with more examples: our point is that this Transportation analysis is far too superficial. It is far too glib. There is a refusal to admit to any real problems. There are just numbers. Freeways are beyond capacity? "No problem - there will be mode shifting." What are the real impacts, in terms that will convey the problems both qualitatively and quantitatively (e.g., increases in commute times, decreases in average Muni speeds)? **E.1.4 E.1.7 E.1.4.2 E.3.1**

We believe that a detailed simulation of the transportation and transit systems must be done. We do not believe that the transportation analysis was taken seriously enough. Air pollution impacts are not even considered, despite a 34% increase in parking demand and masses of cars which will be idling in stalled downtown traffic. (Perhaps the transportation consultants should be sent to Houston or New York City, so that they can see what really does happen when systems are loaded beyond capacity.) **E.1.1.1 E.1.7 I**

Regional transportation impacts are not discussed at all. Probable tie-ups at bridge toll plazas, traffic flows on Interstate 80, and the costs of capacity expansion for all regional transit systems are just a few of the regional impacts which must be analyzed. How much longer will it take to get from Marin or Concord to San Francisco? How much longer will the average delay be for commuters leaving the City?

Local transportation impacts must also be discussed further. How long will the lines of cars waiting to get on freeways be in the downtown area during the pm peak? What will additional congestion do to average Muni

E.1.4.2
E.1.5
E.1.7
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E.2.4
E.2.5
E.2.6
E.2.7.4
E.3.1

speeds? Discuss the increases in traffic through the neighborhoods as major corridors are loaded beyond capacity. Discuss the carbon monoxide levels in the downtown area. **E.1.4.2 E.3.2 I.4**

Fiscal Issues

I confess to not having had the time to give more than a cursory look at the Fiscal Impacts section of the Report. David Jones' testimony for SFRG will cover that area in greater detail. A few points that stand out immediately, however:

- The figures in Tables V.G.1 and V.G.2 seem to be inconsistent - they do not add up.
- The integrity of the fiscal analysis is clearly called into question by the fact that BART costs are not included as real costs, despite the 87% capacity increases required by the year 2000, even under the artificially low growth scenarios analyzed in the Report. Nor are the costs to other transit agencies analyzed.
- It seems incredible that Muni is projected to be able to serve 26% more peak hour passengers, in more and more congested traffic, for an additional cost of just $15.6 per year.

In any event, SFRG questions whether there could be any amount of revenue to the City which could possibly compensate for the congestion, environmental degradation and decreases in the quality of life which are outlined in the other sections of the Report. **E.1.2 E.2.1.2**
E.2.7.1
Z.3.

Mitigation Measures

The Consultant's Report shows that the City's only hope for the future - the only way to substantively reduce the projected transportation impacts and to allow for steady, long-term growth - is through a 500,000 square foot annual limit on office development. (This limit must, of course, be construed to apply city-wide and to include office conversions as well, in order to be effective.) Even then, the Report shows (p. VI.E.9) that the number of person trip ends still grows from 180,000 to 217,350 (21%) under Alternative 4 with the 500,000 square foot annual limit. But at least that's less destructive than the 240,000 person trip ends (a 33% increase) under Alternative 1 without an annual limit. (Note again, that these numbers only consider half the growth, as discussed earlier.)

B.1.1 E.6.1 P.1

Mitigation measures are the only hope for reducing the magnitude of the problems discussed, under any of the five Alternatives. Therefore, the Mitigation Section of the Report should be greatly expanded. It should discuss the annual limit in greater depth. It should also discuss rental housing, job training and regional transit system mitigation measures.

P

A.2
B.5.5
E.6.2

In summary, with respect to this Report, SFRG asks that the following changes be made:

- broaden the scope to include all of the major downtown growth areas and a "base case" growth rate which more realistically represents the growth rate of the 80's;
- restructure the tables for a more honest reporting of the impacts for the period 1984-2000;
- address the issues of job needs of San Francisco residents and housing deficit created by downtown growth;
- require a detailed transportation simulation analysis, which clearly conveys the implications of capacity-constrained corridors. This point is very significant, we feel, for as long as this Commission does not understand that the major impacts of downtown growth are due to the sheer numbers of people coming into the downtown area, rather than the precise location of new downtown office growth, then precious time will be wasted with pointless schemes for "redirecting growth" to less congested areas of downtown.

In conclusion, SFRG would have liked to have come before you today to

B.11 B.1.2 B.2.1 B.5.2 B.5.3 E.1.1

tell you that the Downtown EIR Consultant's Report represents a clear victory for us, since it shows that the SFRG Alternative creates the most jobs for San Francisco residents, with the least pressure on housing prices and rents (p. V.D.46), the least blue-collar job displacement, the least transit and transportation system impacts, the fewest number of new commuters, and the most housing units constructed. B.5.4 Z.1

But, the sad truth is that the Downtown EIR Consultant's Report, for all of its flaws, shows that SFRG's proposals haven't gone far enough to bring San Francisco's downtown growth back into environmental, social and economic balance. We believe that this Report indicates that this Commission must impose an immediate moratorium on downtown office project approval so that, when a new Downtown Plan is finally developed and approved, that Plan might have some impact before the next decade. We ask this Commission to take the necessary steps to impose this moratorium as soon as possible. S.1.2

Lastly, lest SFRG's overall position on downtown growth be misunderstood or considered extreme, we refer you to the Commerce Element of the City's Master Plan. SFRG's philosophical beliefs are concisely expressed in that Element (p. IV.A.4 of the Consultant's Report):

> "concern over issues of public cost and environmental impact is not merely opposition to further development but a recognition that there are practical limits to that growth which would benefit residents and business alike." A.1 Z.1

Thank you for your courtesy in providing us with the opportunity to speak before you today.

Carl F. Imparato

Carl F. Imparato
San Franciscans for Reasonable Growth

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COMMENTS ON THE DOWNTOWN PLAN EIR: TRAFFIC ANALYSES

I. SURFACE TRANSIT IMPAIRMENT FROM TRAFFIC CONGESTION

A. THE JAMMED INTERSECTIONS RESULTING FROM INCREAED VEHHICLE TRAFFIC WILL SO IMPEDE MUNI AND OTHER TRANSIT SYSTEMS SUCH THAT MERELY ADDING MORE TRANSIT VEHICLES WILL NOT BE ABLE TO INCREASE TRANSIT CAPACITY.

DISCUSSION: The DP EIR states on that: **E.2.1** **E.2.2.3** **Z.1**

"MUNI operations would be adversely affected by increased congestion. Figure IV.E.3 shows areas of traffic congestion expected during the p.m. peak period related to the intersections analysis. Operation of the MUNI surface transit routes through the congested areas would be impeded; this would leato decreased levels of MUNI service since scheduled headways would not be met. From the intersection analysis, it appears that transit operation af First, Mission, Stockton, and Sutter Streets (all of which are designated as transit preferntial streets in the Master Plan) would be constrained." (p. IV.E.15), and that;

"The increasing levels of congestion on surface streets (by 1990) would extend into the peak period as shown in Figure IV.E.3 where the areas of constrained (congested) folwo would expand to affect operations at other intersections. MUNI operations w;ould be affected by the increased levels of congestion. Surface transit operations would be slowed which w;ould have the effect of increasing the frequency of "crush" loadings on individual transit vehicles." (p. IV.E.33), and that;

"Peak-hour operating conditions on the San Francisco street system would be expected to deteriorate by 1990. Areas near freeway ramps which are already experiencing Level of Service E and F operation in the peak hour would be expected to continue to operate in unaccptable conditions and may eteriorate into jammed conditions with increassing frequecy." (p. I.E.3), and that;

"Passengers per seat ratios are only one measure of adequacy of service. The obvious constraints of operating on heavily used streets in and around the C-3 District causes transit vehicle bunching, loss of running time and lack of schedule adherence which inevitabily reduces service, reliability, and ultimately capacity. In some respect this would not be evident from simple quantitative analyses." (p. IV.E.8)

"Peak-hour conditions would be expected to deteriorate at all of the intersections by the year 2000. Expanded areas of traffic congestion would disrupt surface MUNI operations." (p. IV.E.34) **Z.1**

The DP EIR also notes that, while certain mitigation measures may reduce the level of jammed intersections and congestion, the DP EIR analysis did not assume these would be implemented. **E.2.1** **E.2.2.3** **Z.1**

In addition, Table L.37 and L.38 of the "Downtown EIR Consultants Report" (May, 1983) referenced in the EIR show that:

- °By 1990 MUNI will need an additional 67 motor coaches and trolleys and [illegible]
- °By 2000 MUNI will need an additional 150 motor coaches and trolleys and [illegible] LRVs over those used in 1984 to accomodate new downtown development. **Z.1**

SFRG COMMENTS:

(1) Did the DP EIR analysis of transit capacity and transit loadings take into account the slowdown of surface transit operations which will result from jammed and conjested intersections? If so, how? Do the transit loadings and passenger per seat loadings in Table IB.E.2 take into account the decrease in the ability of surface transit to move in 1990 and 2000? **E.2.1**

(2) Given that traffic congestion will "disrupt surface MUNI operations", will the 67 and 150 addtional MUNI motor coaches and trolleys needed by 1990 and 2000 respectively be able to effectively add capacity to the MUNI system if their(and existing) transit vehicles movement will become more impaired with time? **E.2.2.3**

(3) The DP EIR notes that "surface transit operations would be slowed" due to increased congestion and "crush" loadings would increase. However, Table IV.E.2 shows MUNI transit loading (in terms of passengers per seat) improving from 1984 to 1990 and 2000. Thus the trasit section of the DP EIR predicts MUNI trasit loadings during the peak p.m. period will improve, while the traffic section of the DP EIR states it will deteriorate. The should recalculate Table IV.E.2 based on the inability of surface transit to move because of congestion on San Francisco streets. **E.2.2.3**

II. TRANSPORTATION NETWORK CAPACITIES

A. THE CAPACITIES OF THE BRIDGES, HIGHWAY 101, AND INTERSTATE 280 BASED ON ACTUAL OPERATING EXERIENCE SHOULD BE DISCUSSED AND EVALUATED **E.3.1** **Z.1**

DISCUSSION: The DP EIR states that:

> "Although the capacity of the Bay Bridge is calculated to be 9,000 vehicles per hour (vph), the one-hour demand shown in Table IV.E.3 represents the effective capacity. During high volume periods, traffic flow approaching the Bay Bridge is sensitive to the concertration of merging vehicles and occasional interruptions caused by stalled vehicles and/or accidents. When slowdowns on the Bridge occur, flow conditions on freeways and feeder streets or on the approaches rapidly deteriorate. Even though the incidents that couse the slowdowns on the Bridge are temporary and quickly cleared, the time requireed for conditions to retrun tonormal at the approaches to the Bridge may extend beyond the peak hour." (p. IV.E.13) **Z.1**

SFRG COMMENT:

(1) A slow vehicle, stall, accident, or other obstical to optimum flow conditions on the bridges or on the highways which they feed seems to be almost a daily occurance rather than the exception. The DP EIR should contain an estimate, based on actual experience, of what percent of the time the bridges and highways have no impediments to flowing at optimal capcity during the peak p.m. rush hours. (perhaps KCBS traffic watchers can give you an estimate). Table xxxxxxx should be expanded to include an average "realistic" (non-optimal) indication of the average bridge and highway vehicle per hour capacities based on operating experience. **E.1.3** **E.3.1**

(2) The DP EIR should indicate what the traffic capacities of the transportion network are during rain or inclement weather. **E.3.1**

B. IMPACT OF AUTOMOBILE TRAFFIC ON SAN FRANCISCO NEIGHBORHOOD STREETS

DISCUSSION: The DP EIR notes that the major traffic constraint on the Route 101 South freeway is at the intersection of Interstate 280 and highway 101, which is inside the City and County of San Francisco. However, the DP EIR analyzes the traffic constraits at the County Line rather than at this interchange. It states that: **Z.1**

> "although this interchange is the major capacity restraint for the freeway system inside San Francisco, conditions have been analyzed at the county line because of the abundance of surface routes that allow traffic from the downtown to bypass the U.S. 101/I-280 interchange." (p. IV.E.13) **Z.1**

Similarly, city streets parallel to Lombard Street in the Marina and Geary St. and Pine/Bush to the Richmond are used to get to the Golden Gate Bridge and other City streets are used to get to Daly City to avoid the 101/I-280 interchange.

Z.1

SFRG COMMENTS

(1) The DP EIR should indicate the most likely "parallel routes" which C-3 District workers will use to get to the Golden Gate Bridge, the Penninsula, and Daly City. This should include an anlysis of the increased traffic volumes that will be experienced on selected San Francisco city streets and the effect this will have on conditions at key intersections. The DP EIR should also indicate what effects the increased automobile congestions on city streets will have on the ability of transit to function at current schedules. **E.3.2**

III. THE BASIS FOR DETERMINING THE PROPORTION OF THE BAY BRIDGE TRAFFIC COMMING FROM THE C-3 DISTRICT UNDERESTIMATES C-3 ORIGINATING TRIPS

DISCUSSION: The DP EIR states that the determination of whether a Bay Bridge peak p.m. commuter was from the C-3 District or the non-C-3 District of San Francisco was bsed on the approach direction of the vehicle to the Bay Bridge. Z.1

Many C-3 District users of the Bay Bridge park in parking lots in the South of Market area adjacent to or under the Bay Bridge which are not located in the C-3 area. Because of the congestion of the First St. and Harrison Bay Bridge on ramp, many of the automobiles with employees from the C-3 District take other city streets and approach the Bay Bridge from approach directions other than the C-3 area. Z.1

The EIR, therefore, may be underestimating the amount of Bay Bridge traffic attributable to the C-3 area. E.1.2 Z.1

SFRG COMMENT:

(1) The DP EIR should explain why the methodology of determining the origin of automobile trips from the C-3 District based on the approach direction of traffic to Bay Bridge on-ramps is valid, and should revise this metodology. E.1.2

IV. WHAT IS THE BASIS FOR THE ASSUMPTION THAT TRANSIT USE WILL INCREASE AND AUTOMOBILE USE WILL DECREASE? E.1.2 E.1.4

DISCUSSION: The DP EIR states that, for 1984:

"Increased use of transit (about one percent greater than in 1981/81) and ridesharing (about five percent greater than in 1981/82) by C-3 employees in the East Bay corridor would moderate the increase on the Bay Bridge during the peak hour (see Table IV.E.3)." (p. IV.E.15), and that:

"As shown in Table IV.E.1, the percentage of single-occupant auto use (Drive Alone) by C-3 District employees has been assumed to decline in the future." (p. IV.E.31), and that,

"Because of increasing levels of congestion on portions of the transportation network, the use of automobiles (especially for commuting purposes) by C-3 District users would be expected to decline by about one percent to two percent from the level of use in 1984; transit use would be ecpected to increase by that amount." (p.I.E.1), and that;

"Single-occupant auto use by C-3 District users has been projected to continue to decline as a percentage of the overall modal split by an additional two percent for the level of use in 1990 (a total of about four percent from the 1984 level); transit use would be expected to increase by the same amount." (I.E.1). Z.1

For the p.m. peak period, Table IV.E.3 shows that, from 1981/82 to 1984:

[illegible]

°Golden Gate Bridge demand rose 370 vehicles (from 13,500 to 13,870); Z.1

SFRG COMMENTS:

(1) Have the DP EIR assumptions about automobile use and transit use been validated by comparison of actual 1981/82 and 1984 information? What has been the increase or decrease of automobile usage on the Bay Bridge and Golden Gate bridge between 1981/82 and 1984? What has been the increase or decrease in Golden Gate Transit and A.C Transit use? **E.1.2**

V. INCREASED LENGTH OF THE COMMUTE PERIOD

DISCUSSION: The DP EIR states that:

"Operating conditions on the regional freeway and bridge system in 1990 would be in the upper range of Levels of Service E With unstable flow and reduced oerating sppeds (about 35 MPH). Peak-of-the-peak conditions woud be expected to extend over longer periods of time and individual motorists would be excpected to be delayed for longer periods of times during the evening commute." (p.IV.E.32) **Z.1**

SFRG COMMENT:

(1) The length of a persons cummute is a key factor in their quality of life. The DP EIR should give some indication of how much longer the morning and evening commute periods will be extended by 1990 and 2000. **E.1.4.2**

JUN 4 1984 to DCP

COMMENTS ON THE DOWNTOWN PLAN EIR: METHODOLOGY FOR DETERMINING CUMULATIVE IMPACTS

I. MODEL VERIFICATION

A. DISCUSSION: The accuracy of a model for determining future conditions is determined by the validity of the assumptions used in the model, the quality of data use for input to the model, and the ability to verify the model. To verify the validity of a model it is necessary to input historical information to see if it accurately predicts the pressent situation. For instance, if a model is used to project the demand for office space in 1990 based on 1984 data, one way to test the validity of the model is to see if it accurately predicts the present 1984 denmand for office space using 1978 data. **B.1.3**

Modeling is a very powerful tool, but it presents opportunities for error, misunderstanding, and abuse because the public and decision makers cannot independently verify if they are accurate. **B.1.3** **Z.1**

The California Environmental Quality Act requires infomation in an EIR to be accurate, adequate, objective, and understandable so that the public and decision makers can make intellegent decisions. If the basis for the environmental impacts from cumulative office development rests primarily on a model simulating future conditions then the assumptions for the model and the reasons why the public should believe the model is valid must be explained in understandable terms. **B.1**

The basis for the environmental analysis of cumulative office development in this EIR is based on models. The magnitude of employment, transit, traffic, housing, and other impacts are determined as a result of these models. The Downtown Plan EIR states that:

> "To provide an adequate analytical basis, a travel demand model has been developed that utilizes information specific to the C-3 District and data concerning regional travel growth to make projections of total demand on the transportation network serving the C-3 District. The travel demand model is unique and differs from the analytical techniques used in other projections of transportation demand for EIR analysis.
>
> For each of the target years (1984, 1990, and 2000), the entire (existing and future) components of travel from the C-3 District have been simulated by this model." (p. IV.E.1); and that,

> "The methods used to project future land use and employment in this analysis may be considered a hybrid of the two approaches. Future conditions include development currently proposed in the C-3 District as well as projections of the amounts of additional development and employment that would be absorbed in the C-3 District. The travel demand analysis models and projects travel form the entire C-3 District over time. This differs from project EIR analysis which simply adds an increment of future travel demand to the existing base. The modeling procedure allows for changes and refinements to employee residential locations and travel demand over time." (p. J.3); and that,

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"The transportation analysis in this report has incorporated growth in travel demand from ares outside the C-3 District through the process of applying historic trends to the non-C-3 travel components." (p. J.3.); and that,

"Estimates of future transit capacities were made on the basis of proposals contained in the current cycle of Five-Year Plans for each of the transit agencies." (p. J.25) **Z.1**

B. SFRG COMMENTS:

(1) The EIR should:

°Describe in understandable terms the major components of the model for predicting future office demand and employment in 1990 and 2000 (are they price of land, regional factors, housing costs, national economy, foreign trade?).
°Subjectively describe the relationship between and realtive weights given to the major components of the model.
°Identify the type and sources of the 1981 data used as input to predict conditions in 1990 and 2000.
°Use the same type and source of data from 1975 to "predict" the demand for office space and employment in 1984. The ability of the model to accurately predict from 1975 data the conditions in 1984 should give an indication of its accuracy and validity. **B.1**
°Describe whether if the model was or was not successful in predicting 1984 conditions based on 1975.data **E.1.1.1** **E.1.2** **E.1.3** **R**

(2) In the past two years there have been new and significant trends in location of office space and housing in the region.

°A major area for new development in San Francisco is in the South of Market area and in the industrially zoned areas outside the C-3 District.
°A May, 1984 article in the San Francisco Chronicle published a report which showing that San Francisco housing is increasing being used by people employed in the Peninsula.
°Commercial office and business development outside of San Francisco is creating a housing demand which cannot be accomodated by the counties in which that development occurs.

The DP EIR states that "historic trends" have been applied to non-C-3 travel components and that regional travel growth was used in making projections. What historic trends wre assumed? (1970-1980?, 1982-1983?) What is the validity of these assumptions given recent trends in housing and employment? **E.1.5**

(3) Do the other counties in the Bay Area have plans or ability to constuct the housing (in excess of housing needed to satisfy internally generated housing demand) to satisfy the demand for housing from San Francisco development that the Downtown Plan EIR presumes will be accommodated in their counties? **D.3.2.1**

(4) The DP EIR assumes that transit agency proposals contained in thier
Five-Year Plans will be implemented. The EIR should indicate the **E.2.1.1**
extent to which past transit agency plans have been implemented and **E.2.1.2**
indicate the potential for implementation of the proposals in current
Five-Year Plans.

(5) The model for transporatation predicts more transit use and less automobile
use (in terms of the percent of commuters using each mode) between 1981/82
and 1984). Recent information (May, 1983 article in the San Francisco
Examiner) from transportation agencies shows the measured 1984 data
indicates the exact opposite has happened, automobile use is up and
transit use is down. Given this informantion, the EIR should explain
the basis for its model and indicate why it should be used to project **E.1.1**
1990 and 2000 conditions. **E.1.2**

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COMMENTS ON THE DOWNTOWN PLAN EIR: PUBLIC TRANSIT

I. EXISTING TRANSIT CAPACITY

A. THE SOURCE OF AND ACCURACY OF 1981/82 BASE CAPACITY DATA FOR TRANSIT SYSTEMS SHOULD BE CITED AND VERIFIED

DISCUSSION: The DP EIR states that:

"analysis of existing conditions was undertaken to establish the travel patterns of C-3 District users (both employees and visitors) and to establish travel patterns on roadways and transit stystems serving the C-3 District, downtown San Francisco, and San Francisco as a whole." (p. J.1), and that;

"capacities for each of the transportation modes were determined from field measurements, analysis of count data, and schedule calculations." (p.J.1), and that;

"the travel demand analysis was calibrated using data for 1981/82. (p. IV.E.3), and that;

"Total daily travel generated by the C-3 District on an average weekday in 1981/82 was 2,242,000 person trip-ends (pte). In 1981/82, p.m. peak-period travel represented about 12% (267,400 pte) of the daily total. **Z.1**

An accurate analysis of existing transit use and capacity is essential to determining the environmental impact of future development, since the existing conditions are the base from which future projections are made. The accuracy, reliability, and up-to-dateness of the field measurements and count data is a crutial factor in the adequacy of the transit analysis in the EIR. **Z.1**

Figure 9 of the MUNI 1983-1988 Five Year Plan shows the percentage of vehicles available for service on any given day is extremely variable, and has reached as low as 75% of the projected scheduled runs in 1981/82. Therefore, projecting transit capacity based on the assumption that transit agencies are adhering to their schedules extremely underestimates the the overcrowding of busses which is actually occuring on the streets. **E.2.2**

In conversations with MUNI and PUC planners SFRG has been told that MUNI has taken no comprehensive and accurate actual citywide measurements of MUNI line-by-line ridership to the Downtown C-3 district (based on actual counts) in recent years. **E.2.2**

QUESTIONS:

(1) The DP EIR should indicate whether MUNI and other transit agency capacity was based on projections assuming that the transit agencies were running the number of vehicles scheduled, or was it based based on actual line-by-line counts of passengers on vehicles? **E.2.2**

(2) The DP EIR should indicate the source of the 1981/82 transit ridership data that was used as the basis for the DP EIR, both for the MUNI and for other transit systems? Has the MUNI verified this information is accurate? **E.2** **E.2.2**

(3) Was the 1981/82 MUNI capacity information based on accurate actual measurements of MUNI lineby-line ridership to the Downtown C-3 District (based on actual counts). **E.2.2**

(4) What actual transit counts were done to verify the 1981/82 tranit information? Were any actual MUNI counts done in 1984? If none were taken, what is the most recent accurate MUNI information containing actual counts of ridership for the MUNI lines serving the C-3 District? **E.1.2** **E.2.2**

(5) Does the MUNI concur that only 12% of the person trip ends (pte) generated by the downtown C-3 District on an average weekday occurs in the two hour even peak P.M. period? What is the basis for this information. **E.2.2**

(6) Are only transit vehicles going in the peak direction during peak a.m. and p.m. periods counted when determining transit capacity? **E.2**

B. 1984 OVERCROWDING ON MUNI IS VASTLY UNDERSTATED

DISCUSSION: Table IV.E.2 of the DP EIR shows the following for MUNI during the peak p.m. hour period. (columns for people standing and seated were derived from passenger per seat ratios.)

MUNI Corridor	1981/81 passengers per seat	people per bus or trolley		people per LTV		Level of Service
		sitting	standing	sitting	standing	
Northeast	1.07	48	3	—	—	D
Northwest	1.17	48	8	—	—	D
Southwest	1.34	48	16	68	23	E
Southeast	0.98	48	0	—	—	D

(note: bus seated capacity = 48 persons; LRV seated capacity = 68 persons)

MUNI Corridor	1984 passengers per seat	people per bus or trolley		people per LTV		Level of Service
		sitting	standing	sitting	standing	
Northeast	1.16	48	8	—	—	D
Northwest	1.26	48	12	—	—	E
Southwest	1.45	48	21	68	30	E
Southeast	1.06	48	3	—	—	D

Z.1

The DP EIR, however, states that the actual levels of transit service are better than what is indicated above. It states that " because Metro vehicles can accomodate higher loadings (2.0 passengers per seat) than busses or trolleys (1.5 passengers per seat) the level of service would be somewhat better than shown in table IV.E.2." (emphasis added) Z.1

The DP EIR also states that, "peak hour Metro operations in 1981/82 were level of Service D (1.63 passengers per seat)." (p.IV.E.8). Z.1

The MUNI peak p.m. period loadings shown in table IV.E.2 and summarized above are substantially less than those experienced by anyone who attempts to use the MUNI during peak periods in the C-3 District. The DP EIR loadings are also explicitly contradicted by a letter (on next page) dated December 20, 1983 from Harold Geissenheimer (MUNI General Manager) to Tony Kilroy stating that:

> "On the whole, we consider our peak period downtown services - and specifically the 38, 38L, and 38AX/BX Expresses - to be operating at or above 'capacity load' conditions." (emphasis added) Z.1

E.2.2

Mr. Geissenheimer defined "capacity load" conditions as above 1.5 persons per seat. The Downtown Plan EIR, however, shows none of the downtown lines [illegible] peak period (not just peak hour) services are above 1.5 passengers per seat.

E.2.2

December 20, 1983

Mr. Tony Kilroy
473 - 11th Avenue
San Francisco, CA 94118

Dear Mr. Kilroy:

I am writing in response to your letter of November 3, in which you requested information on MUNI's standards for capacity on our diesel lines.

For lines such as the 38BX, we try to schedule our buses to achieve an average load factor of between 1.25 and 1.5 for peak period trips. That means that on a coach with a seated capacity of 48, a total passenger load of 72 would be reasonable.

The Geary express lines are among the most heavily travelled in the City. Over the past three months, the average load factor was 1.5 in the morning peak period. This is of course an average, indicating that several individual coaches are operating at above "capacity" levels. There are also certainly days when crowding is even more severe, particularly if even one trip is missing because of an equipment failure. Improvements in our diesel fleet should assure that service operates according to scheduled levels.

On the whole, we consider our peak period downtown services - and specifically the 38, 38L, and 38AX/BX Expresses - to be operating at or above "capacity load" conditions. We are consequently planning on assigning many of our new articulated coaches to the Geary services when they enter service later this year, allowing us to increase service capacity without corresponding increases in cost.

I appreciate your continued interest in MUNI service. Your concerns are shared by all of us at MUNI.

Sincerely,

Harold Geissenheimer
HAROLD GEISSENHEIMER
General Manager

PS/BWN:aw

cc: R. Nothenberg

SFRG COMMENTS:

(1) The DP EIR should indicate the basis for the Passenger per Seat ratios shown in Table IV.E.2. Are these based on actual line counts or schedules. Were they verified by the MUNI or PUC? **E.2.2**

(2) The DP EIR should reconcile the contradiction between its statement that MUNI is operating below capacity during the P.M. peak hour while MUNI's letter of December 20, 1983 states that MUNI is at or above capacity during this period? **E.2.2.1** **E.2.2.2**

C. COMPARISON OF 1981/82 CAPACITY AND 1984 CAPACITY CONTRADICTS THE DEPARTMENT OF CITY PLANNING SEPTEMBER, 1983 TRANSIT GUIDELINES

DISCUSSION: The DP EIR states that:

> "Travel for the C-3 District in 1984 would increase about nine percent over the 1981/82 peak period travel, and about six percent over the 1981/82 peak hour travel." (IV.E.4), and that;
>
> "Operating Conditions in 1990 on the transit systems is projected to be the equivalent to 1981/82 conditions, and slightly better than 1984 conditions" (IV.E.9), and that;
>
> "Peak-hour Levels of Service would be worse in 1984 than in 1981/82. MUNI service to the Northwest would drop from Level of Service D to E, MUNI service to the Southwest would drop from C to D, and BART Transbay would drop from E to F." (IV.E.9) **Z.1**

Table IV.E.1 shows MUNI peak hour ridership up 7.9% in the peak for and 4.9% during the peak period between 1981/81 and 1984. **Z.1**

These quotes and statistics clearly state that MUNI levels of service showed more overcrowding in 1984 than in 1981/82. **Z.1**

E.2.2

However, in September, 1983 the DCP issued "Guidelines for Environmental Review: Transportation Impacts". Commercial office development EIRs since that date have used these guidelines as their source of information regarding MUNI's existing and future capacity. They show that MUNI peak hour overcrowding has been significantly reduced in 1983 compared to the 1981/82 transit guidelines were effective. Table C-1 compares the September, 1983 DCP guidelines to the previous DCP 1981/82 guidelilnes. **E.1.6** **E.2.2**

For example previous guidelines showed the MUNI KLMN lines at 96% of capacity during the peak P.M. period in 1981/82 whereas the current guidelines show these lines at 84.5% of capacity during that period. **Z.1** **E.1.6**

E.2.2

These 1983 DCP transit guidelines show that 1984 MUNI transit loadings have gotten significantly less since 1981/82. The DP EIR states that 1984 MUNI transit loadings have gotten significantly greater since 1981/82. **E.1.6** **E.2.2**

SFRG COMMENT:

(1) The DP EIR should explain the basis of the DCP 1983 transit guidelines and indicate how they were derived. Did the PUC or MUNI approve of these guidelines? **E.1.6 E.2.2.2**

(2) The EIR should indicate why there is a conflict between the DCP September, 1983, "Guidelines for Environmental Review: Transportation Impacts" analysis and the DP EIR analysis of transit capacity changes between 1981/82 and 1984. Which document is correct? **E.1.6 E.2.2.2**

TABLE C-1: EXISTING MUNI LOADINGS AND CAPACITY

Projections of transit ridership and vehicle capacity from the DCP 9/83 transit guidelines for EIRs compared to previous DCP transit guidelines. These figures represent the existing base case for commercial office development EIRs.

	NEW (9/83) DCP TRANSIT GUIDELINES*		PREVIOUS DCP TRANSIT GUIDELINES*	
MUNI Transit Lines	# of riders during peak P.M. hour	% of capacity	# of riders during peak P.M. hour	% of capacity
1/1AX/1BX	2,120	97%	2,093	99%
2	383	73%	474	110%
4	327	65%	467	108%
5	521	75%	981	94%
31/31X/31BX	842	83%	1,070	103%
38/38L/38AX	2,176	99%	2,698	104%
Total Richmond Lines	6,369	91%	7,783	100%
KLMN	5,559	84.5%	5,725	96%

Z.1

II. FUTURE TRANSIT CAPACITY

A. WILL MUNI AND OTHER TRANSIT AGENCIES HAVE THE FINANCIAL CAPABILITY TO EXPAND AS PROPOSED?

DISCUSSION: The DP EIR states that:

"Transit service improvements scheduled to occur by 1990 have been assumed to increase the service availability by about 15% to 40% on the various systems serving San Francisco." (p. I.E.2), and that;

"Estimates of future transit capacities wre made on the basis of proposals contained in the current cycle of Five-Year plans for each of the transit agencies. The Downtown Plan contains proposals for additional transit improvements not described in the Five Year Plans; none of these proposals have been included in the future capacities" (p. J.25), and that;

"For 1990 MUNI capacities increased on the basis of line-by-line improvements shown in the 1983-88 Short range transit plan. (Average peak hour increase would be about 15% over 1981/82)." (p. J.6) **Z.1**

The DP EIR analysis assumed future transit capacities would expand according to the proposals of transit agencies. However, some of the capital expansion proposals of these agencies are competing for the same federal funds allocated by the MTC, and the MTC is competing nationally against many muncipalities for these same funds. There is therefore no assurance that federal funding will be forthcoming for these proposals. **E.2.1.2**
E.2.7

For instance, the MTC December, 1983 "New Rail Starts and Extensions, Staff Recommendations" gives a range of from $ 356 million to $ 635 million available for capital improvements for the Bay Area in the 1983-88 five year period (Table x, attached). However, page 34 of this report states that "the lower end of the range is optimistic and assumes a good competitive position for the region. The upper end of the range would require an excpanded Federal program." In other words, it is unrealistic to assume even the lower number of $ 356 million will be available for Bay Area transit systems in the next 5 years. **E.2.1.2**
E.2.7

Attached is Table 4, page 15, of the MUNI FY 84-88 Capital Improvement Program. It shows that there are 628 million dollars of proposed capital improvements from 1984-88. Also attached is a copy of Table 8 from this document showing that a best case deficit of 105 million dollars and a worst case deficit of 406 million dollars over the next five years in actually funding the 628 million dollars in proposed capital improvements. In other words, the money for these improvements does not exist. As noted by the MTC quote in the preceding paragraph, however, even the "worst case" may be optimistic. **E.2.1.2**
E.2.7

It is therefore necessary to know (1) the costs of the capital expenditures and the operation and maintainance expenditures of the transit improvements necessary to accomodate new development and (2) the likelyhood of federal or state grants to assist in the payment for these improvements. **E.1.4.1**
E.2.1.2
E.2.7

TABLE 4

SAN FRANCISCO MUNICIPAL RAILWAY
CAPITAL IMPROVEMENT PROGRAM 1984-88
PROJECT PRIORITIES AND FUND REQUIREMENTS

	Project	Total Cost* (000's)	Annual Element Year 1	Year 2	Year 3-5	MTC Annual Element Status
1.	Cable Car System Reconstruction	12,837	12,837	0	0	Section 3
2.	Cable Car Vehicle Improvement	1,100	600	500	0	Section 9
3.	New Bus Storage Facilities	43,448	9,400	11,148	22,900	Section 9
4.	Auxiliary Trolley Power	7,100	3,700	3,400	0	Section 9
5.	Trolley Overhead--Market Street	6,500	6,500	0	0	Section .
6.	LRV Modifications	12,213	9,337	0	2,876	Section 9
7.	Storage and Maintenance Facilities Rehabilitation	5,215	1,000	2,120	2,095	Section 9
8.	Metro Center Improvements	1,616	830	378	408	Section 9
9.	J Line Connection	18,500	1,000	17,500	0	Section 9
10.	Metro System Enhancements	6,983	1,630	1,737	3,616	Section 9
11.	Security Improvements	554	290	108	156	Section 9
12.	SFMERL Payments	20,183	4,182	4,115	11,886	Section 9
13.	Elderly and Handicapped Accessibility Improvements	1,737	372	135	1,230	Unfunded
14.	Miscellaneous Equipment and Non-Revenue Vehicles	11,730	2,000	2,160	7,570	Section 9
15.	Fare Collection and Controls	4,865	2,600	1,680	585	Section 9
16.	Trolley Overhead Rehabilitation (Other than Market)	11,730	2,000	2,160	7,570	Section 9
17.	Trolley Additions and Betterments	43,930	3,590	8,640	31,700	Unfunded
18.	Trolley Coach Purchase	26,800	12,000	14,800	0	Unfunded
19.	Information, Communications, and Control Systems	9,000	2,000	2,240	4,760	Section 9
20.	Public Information Improvements	2,200	360	280	1,560	Section 9
21.	Embarcadero Turnaround	47,500	3,500	0	44,000	I-280
22.	Bayshore Electrification	85,250	250	0	85,000	Unfunded
23.	Geary Street Electrification	137,750	250	0	137,500	Section 9
24.	Market Street Rails	15,000	50	7,450	7,500	Unfunded
25.	Northeast Waterfront Rail Lines	42,300	3,200	0	39,100	I-280
26.	Computer Systems Improvements	5,270	500	2,430	2,340	Section 9
27.	Transit Preferential Streets	1,115	445	320	350	Unfunded
28.	Diesel Bus Purchase	31,100	0	0	31,100	Unfunded
29.	Trolley Coach Propulsion	14,900	0	14,900	0	Unfunded
	TOTALS	628,426	[illegible]	[illegible]	[illegible]	

TABLE 8
COMPARISON OF ANTICIPATED CAPITAL REVENUES VS. PROPOSED EXPENDITURES
FY 1984-88
(millions of dollars)

Year	Anticipated Revenue		Proposed Expenditure	Best Case Deficit* (Surplus)	Pessimistic Deficit (Surplus)
	High	Low			
1983-84	99.2	52.2	83.6	(15.6)	31.4
1984-85	101	44.5	98.2	(2.8)	53.7
1985-88	322	125	446.1	124.1	321.1

*Most capital revenue allocations are project specific, rather than unrestricted reserves. Therefore, it is unlikely that such a surplus would actually accrue to the Muni's balance sheet. A projected "surplus" under the best case funding assumptions more realistically translates into a higher likelihood that all proposed expenditures would be fully financed.

Z1

SFRG COMMENTS:

(1) The DP EIR should explain what is meant when it states that "future transit capacities were made on the basis of proposals contained in the current five year cycle of Five Year Plans". Does the DP EIR assume the Five Year Plans would be fully funded? Specifically for MUNI, did the DP EIR assume the 628 million dollars of capital improvements listed in Table 4 of the MUNI FY 84-88 Capital Improvement Program would be funded? **E.2.1.2**

(2) As can be seen from this table, many of the capital improvements proposed by the MUNI Five Year plan agencies has Federal and state funds funds assumed for these improvements. To the extend Federal and state funds are not forthcoming for the improvements as proposed by MUNI what effect will this have on the transit, traffic, and parking analyses of the DP EIR? This same question should be answered for other transit agencies. **E.2.1.1** **E.2.1.2** **E.6**

(3) If there are any Federal or State grants for operation and maintainance of transit systesm, will the proposed increases in the capacity of MUNI and other transite systems increase the amounts of these grants in future years according to existing grant formulas? **E.2.1.2** **E.2.7**

(4) Given the unsure nature of funding for future transit systems, the DP EIR shuld include a worst case "limited transit action" scenerio which presumes limited federal or state funding. This scenerio should describe the effects on transit systems, traffic, and automobile use if the transit proposals of transit agency Five Year Plans are not implemented. **E.6**

(5) The DP EIR should summarize in a table the number and cost of additional MUNI transit vehicles vehicles to necessary to accomodate additional downtown development for the years 1990 and 2000 and the operation and maintainance costs to run these vehicles in 1990 and 2000. In addition, this table should list the cost of additional car barns and other capital improvements necessary to utilize the addtional transit vehicles (such as the MUNI Metro turnaround). Attached is an example of a the table which should be filled out for each transit agency. **E.6.2.1** **E.2.7** **E.6**

(6) The DP EIR should also summarize in a table the same type of information requested in (5) above for other Bay Area transit agencies. This should be put in the same format as for MUNI information. **E.6**

(7) The Downtown EIR should indicate the total dollar value of transit improvements assumed to occur by 1990 and 2000 to accomodate the 100,000 additional workers in the downtown San Francisco area. How many dollars per new worker is the cost of these improvements? **E.1.4.1** **E.2.1.2** **E.6**

TABLE xx: COST OF TRANSIT IMPROVEMENTS TO ACCOMODATE NEW C-3 DISTRICT COMMERCIAL DEVELOPMENT

TRANSIT SYSTEM: ________________

	1981	1984	1990	2000
A. Transit Capacity: (Peak P.M. Hour)				

B. Addtional Capital Improvements:

Improvement	Cost	Additional Capacity Provided	Proposed Funding Source	Is Funding Definite	Completion Date
# of busses by 1990					
# of trolleys by 1990					
# of LRVs by 1990					
Oper. & Main. costs in 1990					
System Improvements by 1990					
■Metro Turn.					
■Car Barns					
■_____					
■_____					
# of busses by 2000					
# of trolleys by 2000					
# of LRVs by 2000					
Oper. & Main. costs in 2000					
System Improvements by 2000					
■Metro Turn.					
■Car Barns					
■					
■_____					

B. NON-C-3 DISTRICT LOADINGS ON THE C-3 DISTRICT TRANSIT SYSTEM SHOULD BE QUANTIFIED

DISCUSSION: The DP EIR states that:

"Non-C-3 travel is travel that does not have an origin or destination in the C-3 District, yet occurs on the same transportation network as C-3 transit." (p. J.20), and that;

"the transportation analysis in this report has incorperated growth in travel demand from areas outside the C-3 District throurh the process of applying historic trends to the non-C-3 travel components. Thus the type of analysis used in this document presents a complete description of the comulative transportion impacts of downtown development (p. J.3, emphasis added), and that;

"Thus, because the travel demand process has estimated total future travel, not just travel from the C-3 District, this section contains a comprehensive analysis of cumulative impacts of the transportation network serving San Francisco." (p. IV.E.2)

"Future conditions include development currently proposed in the C-3 District as well as projections of the amounts of additional development and employment that would be adsorbed in the C-3 District." (p. J.3), and that; **Z.1**

Thus, the transit impacts on MUNI lines serving the downtown C-3 district and on other transit systems should incorperate non C-3 travel that can be anticipated to occur on these same systems from areas outside the C-3 area. The accuracy of the transit analysis will therefore depend in great part on the accuracy of the assumptions of the demand for transit that will occur from the non C-3 area. **E.1.5** **E.2.2**

Because of the dramatic increase in the amount of development recently constructed in and planned for areas adjacent to the C-3 area, using the "historic trends" for development in this area may or may not be accurate depending upon the period of time chosen from which to project the trend. **E.1.5**

SFRG COMMENTS:

(1) The DP EIR should indicate how many million square feet of addtional commercial office and retail space was assumed to occur between 1981 and 1984, 1990, and 2000 in non-C-3 areas which would use the same transit system as that used by the C-3 District? How much development was assumed for the Van Ness Corridor, the Redevelopment Area, the Mission Bay area, and the South of Market area currently zoned M-1? Was any transit demand for the proposed new San Francisco sports stadium in the China Basin area assumed? **E.1.5**

(2) "Historic trends" were used as a basis for projecting the amount of non-C-3 District development. What was the period used for determining these historic trends. The period used should be very recent to reflect the recent explosion in the amount of development occuring on the periphery of the C-3 District. **E.1.5**

[illegible] Transit, BART, Golden Gate Transit, and Samtrans? Was it assumed that their additional capacity is dedicated to serve San Francisco demand? **E.2.3**

C. WHAT DOES THE DP EIR ASSUME AS THE NUMBER OF NON-C-3 EMPLOYEES THAT WILL UTILIZE THE C-3 DISTRICT TRANSIT SYSTEM.

DISCUSSION: The DP EIR states that:

"Citywide employment is forecst to increase between 1981 and 2000 under the policies of the Downtown Plan. Just over half of this growth would occur in the C-3 District. The balance is likely to be divided about equally between the areas surrounding the C-3 District (south of China Basin including Mission Bay, Civic Center, Northern Waterfront, and the Washington/Broadway Special Use District) and the rest of the City." (p. IV.C.47) **Z.1**

Since the DP EIR indicates that there will be 90,000 new jobs in the C-3 District which will be created in the next 16 years, this statement indicates there will be 45,000 additional jobs immediately adjacent to the C-3 District and 45,000 additional jobs elsewhere in the City over the next 16 years. **Z.1**

SFRG COMMENTS:

(1) How many of these non-C-3 District employees will use public transit? Were these employees assumed as part of the transit capacity analysis in this EIR and are they included in Table IV.E.2? If not, how many employees were assumed outside the C-3 District for the purposes of the transit analysis. **E.1.5**

(2) Is the rate of new growth anticipated by 1990 and 2000 for the C-3 District less than, equal to, or greater than historic trends in that area? **B.1.2** **E.1.5**

D. FUNDING FOR MUNI OPERATIONS AND MAINTAINANCE

DISCUSSION: The DP EIR states that, for MUNI;

"It appears likely that capital projects would be fully funded, whereas funding for operational expenditures would be uncertain in the future." (p. J.25) **Z.1**

SFRG COMMENTS:

(1) What assumptions were made regarding the funding source of these improvements? What is meant by fully funded? Does this mean fully funded with federal funds? Similarly, does the uncertainty of future operational funding mean uncertain federal funds? **E.2.1.2**

(2) If federal funds appear likely, what is the basis for the likelyhood of these funds? Are there current commitments to give San Francisco MUNI these funds? **E.2.1.2** **E.6**

E. MUNI LEVEL OF SERVICE OPERATING CRITERIA.

DISSCUSSION: The DP EIR states that the Level of Service goals for transit system vehicles during the peak morning and evening commute periods are as follows:

- MUNI motor coaches and trolleys: 1.25 passengers per seat (125% seated capacity)
- MUNI Metro vehicles: 2.0 passengers per seat (200% seated capacity)
- BART cars: 1.30 passengers per seat (130% seated capacity) **Z.1**

Thus, the transit goal for MUNI operation during the peak p.m. period is level "D" or better. **Z.1**

Table J.10 on (p. J.36) shows that Service Level D reached when there is a loading of 1.01 to 1.25 times seated capacity, Level E is reached when there is a loading of 1.25 to 1.5 of seated capacity, and level F is reached when there is a loading greater than 1.51 times seated capacity of busses and trolleys. **Z.1**

Table IV.E.2 shows that, in 1990, MUNI lines to the Southwest and Northwest will be at service level "E" during the peak p.m. period. Therefore the DP EIR does not contain an alternative which meets the MUNI transit goals.. **Z.1**

SFRG COMMENTS:

(1) Since MUNI and other transit agencies have established goals for transit service, the EIR should contain a transit senerio which attains those goals. However, the EIR does not. Presumably this is because the MUNI Five-Year Plan does not attain the goals given the amount of downtown development **E.2.2.1**

The EIR should indicate how many additional MUNI vehicles the EIR assumed would be needed by 1990 and 2000 and how many more MUNI vehicles would be needed above those already assumed in order for all C-3 District lines to meet the goal of level of D service or better. **E.2.2.1**

F. THE ASSUMPTION ON THE DIRECTION OF PEAK P.M. NON-WORK TRAVEL FROM THE C-3 DISTRICT UNDERESTIMATES THE TRAVEL IN THE COMMUTE DIRECTION

DISCUSSION: For the transit demand for non-work travel from the C-3 district during the evening commute period, the DP EIR states that:

> "the assumption has been made that 50% of the P.M. peak hour non-work trips are travelling in a non-commute direction and 50% are travelling in a commute direction." (p. J.9) **Z.1**

Many of the non-work trips during the peak P.M. period are from the retail areas of the Embaracedero, Market Street, and Union Square areas. It appears to the casual observer that most of these non-work trips are going away from the downtown area in the commute direction, and very few are going in the non-commute direction. **Z.1**

SFRG COMMENTS:

(1) What is the basis for the DP EIR that 50% of the P.M. peak hour non-work trips are travelling in a non-commute direction and 50% are travelling in a commute direction? **E.1.2**

III. SURFACE TRANSIT IMPAIRMENT FROM TRAFFIC CONGESTION

A. THE JAMMED INTERSECTIONS RESULTING FROM INCREAED VEHHICLE TRAFFIC WILL SO IMPEDE MUNI AND OTHER TRANSIT SYSTEMS SUCH THAT MERELY ADDING MORE TRANSIT VEHICLES WILL NOT BE ABLE TO INCREASE TRANSIT CAPACITY. **E.2.1** **E.2.2.3**

DISCUSSION: The DP EIR states on that:

"MUNI operations would be adversely affected by increased congestion. Figure IV.E.3 shows areas of traffic congestion expected during the p.m. peak period related to the intersections analysis. Operation of the MUNI surface transit routes through the congested areas would be impeded; this would leato decreased levels of MUNI service since scheduled headways would not be met. From the intersection analysis, it appears that transit operation af First, Mission, Stockton, and Sutter Streets (all of which are designated as transit preferntial streets in the Master Plan) would be constrained." (p. IV.E.15), and that;

"The increasing levels of congestion on surface streets (by 1990) would extend into the peak period as shown in Figure IV.E.3 where the areas of constrained (congested) folwo would expand to affect operations at other intersections. MUNI operations would be affected by the increased levels of congestion. Surface transit operations would be slowed which w;ould have the effect of increasing the frequency of "crush" loadings on individual transit vehicles." (p. IV.E.33), and that;

"Peak-hour operating conditions on the San Francisco street system would be expected to deteriorate by 1990. Areas near freeway ramps which are already experiencing Level of Service E and F operation in the peak hour would be expected to continue to operate in unaccptable conditions and may eteriorate into jammed conditions with increassing frequecy." (p. I.E.3), and that;

"Passengers per seat ratios are only one measure of adequacy of service. The obvious constraints of operating on heavily used streets in and around the C-3 District causes transit vehicle bunching, loss of running time and lack of schedule adherence which inevitabily reduces service, reliability, and ultimately capacity. In some respect this would not be evident from simple quantitative analyses." (p. IV.E.8)

"Peak-hour conditions would be expected to deteriorate at all of the intersections by the year 2000. Expanded areas of traffic congestion would disrupt surface MUNI operations." (p. IV.E.34) **Z.1**

The DP EIR also notes that, while certain mitigation measures may reduce the level of jammed intersections and congestion, the DP EIR analysis did not assume these would be implemented. **E.2.1** **E.2.2.3** **Z.1**

In addition, Table L.37 and L.38 of the "Downtown EIR Consultants Report" (May, 1983) referenced in the EIR show that:

*By 1990 MUNI will need an additional 67 motor coaches and trolleys and 15 LRVs over those used in 1984 to accomodate new downtown development.
*By 2000 MUNI will need an additional 150 motor coaches and trolleys and 37 LRVs over those used in 1984 to accomodate new downtown development. **Z.1**

SFRG COMMENTS:

(1) Did the DP EIR analysis of transit capacity and transit loadings take into account the slowdown of surface transit operations which will result from jammed and conjested intersections? If so, how? Do the transit loadings and passenger per seat loadings in Table IB.E.2 take into account the decrease in the ability of surface transit to move in 1990 and 2000? **E.2.1** **E.2.2.3**

(2) Given that traffic congestion will "disrupt surface MUNI operations", will the 67 and 150 addtional MUNI motor coaches and trolleys needed by 1990 and 2000 respectively be able to effectively add capacity to the MUNI system if their(and existing) transit vehicles movement will become more impaired with time? **E.2.2.3**

(3) The DP EIR notes that "surface transit operations would be slowed" due to increased congestion and "crush" loadings would increase. However, Table IV.E.2 shows MUNI transit loading (in terms of passengers per seat) improving from 1984 to 1990 and 2000. Thus the trasit section of the DP EIR predicts MUNI trasit loadings during the peak p.m. period will improve, while the traffic section of the DP EIR states it will deteriorate. The EIR should recalculate Table IV.E.2 based on the inability of surface transit to move because of congestion on San Francisco streets. **E.2.2.3**

IV. WILL LIMITING PARKING PLACES IN THE DOWNTOWN AREA ENCOURAGE MORE TRANSIT USE?

DISCUSSION: The DP EIR notes that it is the policy of the Planning Commission to limit parking places in the downtown area in order to encourage the use of public transportation. **Z.1**

SFRG COMMENTS:

(1) How many parking places have been added or destroyed in the downtown San Francisco area between 1981 and 1984? **E.4**

(2) What has been the increase or decrease in the automobile usage on the Bay Bridge and Golden Gate Bridge betweeen 1981 and 1984? What has been the increase or decrease in public transot usage on the Bay Bridge and Golden Gate Bridge betweeen 1981 and 1984? **E.1.2**

(3) Does this information verify the assumption that limiting parking places in the downtown area will encouage use of public transportation. **E.1.4**

City of Berkeley

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June 4, 1984

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DEPT. OF CITY PLANNING

To: San Francisco Planning Commission

From: Daniel Boggan, Jr., City Manager

Subject: SAN FRANCISCO DOWNTOWN PLAN DRAFT ENVIRONMENTAL IMPACT REPORT

The City of Berkeley has reviewed the San Francisco Downtown Plan Draft Environmental Impact Report (SFDP-DEIR) to determine whether the Project's impacts on Berkeley have been fully ascertained and offset with appropriate mitigation measures. Our attention was drawn to this Project because of: **Z.1**

- its scale - it is projected to increase net building space by 21.7 million square feet between 1984 and 2000 and create an additional 91,200 jobs;
- its very small ability to generate housing for the new employees - the Plan itself is projected to add only 200 units of housing while only 16,200 housing units are forecast between 1984 and 2000 for San Francisco as a whole;
- its heavy reliance on the rest of the region to house downtown workers - of the 376,400 people projected to work in the C-3 area in 2000, about half will live outside of San Francisco, almost 30% in the East Bay. **D.3.2.4**

Berkeley's comments on the SFDP-DEIR primarily address the intertwined issues of the Plan's impacts on Berkeley's housing market and population distribution and its impacts on transportation facilities and services for people who live in and travel to Berkeley.

Our comments identify problems that we have with the DEIR's impact analysis, questions that we believe the San Francisco Planning Commission will need to answer to render an informed decision and finally proposals for additional mitigations. **D.3.2**

Employment Impacts - It is problemmatical that the DEIR does not analyze the Plan's maximum possible impact by projecting impacts at full build-out. "In this EIR, the forecasts of real estate development and employment growth are described as 'impacts' of the Downtown Plan." (IV.C.30) Thus, evaluation and appropriate mitigation of the impacts necessarily depend on the accuracy of the market predictions. The Report lacks information about the impacts that the Plan would allow, including only those the Report considers to be the most likely. **Z.1** **B.1.1**

Questions: What is the projected amount of employment that would occur if the C-3 area were built to the maximum development potential of the Downtown Plan? **B.1.1**

What is the estimated effect of this employment on San Francisco and regional housing markets?

B.1.1
B.2.1

Locational vs Growth Impacts - In general, the regional impacts analysis of the DEIR is flawed by the assumption that the impacts of the Downtown Plan are locational rather than incremental. This is stated most clearly in the section on Growth Inducement. "Most of the employment growth forecast for the C-3 District would otherwise occur elsewhere in the Bay Area, so the associated population and housing effects O
cannot be solely attributable to C-3 District policies." (X.2)

To limit evaluation of environmental impacts only to those which the Report believes would not occur elsewhere in the region if the Project is rejected is to provide decision-makers with very incomplete information about the full range of impacts. If adopted throughout the region, such an approach would insure that most impacts never receive full attention. As a city that is subject to the impacts that the Downtown Plan would generate, Berkeley needs information about all of its population and housing effects. If the plan is rejected, and another city in the region provides for the same employment in another location, the decision-makers in that city will need to consider all the impacts. While this might provide for repeated evaluation of the same impacts (if you make the not neceesarily valid assumption of a closed system), the B.1
alternative suggested by the SFDP-DEIR would never require evaluation of impacts of B.2
projects consistent with the regional market. O

The regional analysis of the SFDP-DEIR is additionally flawed because the locational impacts are not even evaluated. Assuming for the moment that the document is correct, that the employment generated by the Downtown Plan would occur elsewhere in the region, and that we do not need to evaluate the magnitude of the impacts, still we must ask what are the impacts of locating that employment in San Francisco, in the dense center of the region that cannot house almost half of the area's workforce and whose transportation systems are already operating at full capacity. D.3.2.4

Although the Report argues that "C-3 District job growth would not, by itself, make a noticeable difference in the housing markets in the individual counties or in the region overall" (IV.D.81-2), we would not expect regional housing impacts to be uniform. Some cities, especially those adjacent to San Francisco, will be strongly affected. For Berkeley, the impacts of location are not trivial of 376,400 workers projected to work in the adjacent city of San Francisco. The housing market pressures created by so large a work force can only result in increased housing prices in a city D.3.2.2
like Berkeley that has virtually no vacant land to increase its housing supply. D.3.2.3
D.3.2.4

Questions: How many employees of the C-3 District are projected to live in Berkeley in 1990 and 2000? What are the income, racial, age and household composition characteristics of these employees?

What are the impacts on the housing markets of adjacent and other nearby built-up cities of the toal C-3 employment?

How are the impacts likely to be different in built-up cities than in areas at the region's periphery?

B.2.2

How would the impacts of this employment be different for jurisdictions at the center of the region if the employment were located at the periphery? D.3.2.2
D.3.2.3
D.3.2.4

Housing Affordability - The Report provides little information about the impacts of the Plan on the price of housing in San Francisco and the rest of the region. On page IV.B.50, the Report states (presumably on the basis of market analysis) that new units in the C-3 District would be small (900-1000 square feet) and expensive (ranging from $160,000 - $300,000 in 1982 constant dollars, averaging $240,000 per unit). **D.3.2.3** **D.2.6**

Questions: What will be the effects of housing demand that is strong enough to support such high prices for new housing on the sale prices and rents of existing housing stock in San Francisco and adjacent cities?

To what extent will the existing lower-priced housing stock in San Francisco and adjacent cities be up-graded or demolished and replaced in response to this strong demand? What would the sales prices and rents of the upgraded and replacement housing be?

What is the household income that will be required to afford the new and upgraded housing in San Francisco and adjacent cities?

What will the median income be for employees in the C-3 District?

Where will employees with less than median incomes live in 1990? in 2000?

What proportion of their household incomes will they pay for the combined costs of housing and journey to work? **D.3.1** **D.3.2.3** **D.4**

Population Shifts - The EIR states that the net population and household growth generated by C-3 employment will be modified by an increase in the number of employed persons per household in the region. **D.2.4** **Z.1**

> All of the increase in C-3 District workers forecast to reside in the rest of the counties throughout the region...does not represent a net addition of population and households in each county or in the region overall. This is primarily because labor force participation is expected to increase, thereby adding workers without necessarily adding population, households, or housing. As estimated for San Francisco, labor force growth due to increases in labor force participation can be substantial. (IV.D.81) **Z.1**

The Report appears to conclude that the increase in employed persons per household does not represent a negative impact for the communities of the region. Yet, in fact, an increase in employed persons per household is not usually a benign change. This change is often associated with a community's loss of families with children, decrease in average household size, decrease in Black population and increased housing prices. The increase in employed persons per household can be one of the important indicators of population shifts, that low and middle income families, especially those with a single wage-earner, cannot compete for housing with households comprised of working adults. **D.3.2.3**

It may also indicate that existing households require two employed members to support expenses where they formerly depended on only one. This is equivalent to a real drop in living standards caused by increased housing expenses. **D.3.2.3**

Berkeley considers the population shifts and degradation of living standards buried in the DEIR's forecast of growth in the number of employed workers per household to represent serious negative impacts that require mitigation. We are greatly concerned that the increased competition for Berkeley housing with concomitant price increases will exacerbate the displacement of middle income, of Black and family populations that we experienced between 1970 and 1980. We fear that the pressure will counteract or make more difficult our efforts to maintain Berkeley's fragile diversity. **D.3.2.3**

Questions: What increases in the number of employed persons per household are forecast for Berkeley in 1990 and 2000?

To what extent will this change be associated with decline in Black population, families with children, middle income households and reductions in the average household size? **D.1** **D.3.2.3**

Projections of San Francisco Housing - The DEIR forecasts new housing units for all of San Francisco, rather than just those in the C-3 District or just those attributable to the Downtown Plan and suggests that all the units would be available to C-3 employees. The plan does not indicate, however, the total employment development for San Francisco, including that outside the C-3 District, that will be associated with the construction of housing units outside the C-3 District. **D.2.5**

From a Berkeley perspective, it is important to know the full extent of San Francisco's housing/jobs imbalance, since San Francisco by 1981 was already requiring the rest of the region to house more than 200,000 of its employees. **D.2.9**

Questions: What is the toal number of jobs expected in San Francisco in 1990 and 2000?

What proportion of people who work in San Francisco will live elsewhere in the region?

How many are projected to live in Berkeley? **D.2.5** **D.2.7** **D.3.2.2**

Increase San Francisco Household Size - The DEIR predicts that household size in San Francisco will increase as people move in with each other to cover housing costs. Given that household size has steadily declined over more than twenty years, it appears that most people will consider doubling up only as a last measure. More often, people in the Bay area and the rest of the nation have chosen to increase their journey to work before considering an increase in their household size. **D.2.4** **D.3.2.3**

Question: To what extent does the forecast of an increased household size for San Francisco suggest housing hardship not just in San Francisco, but in adjacent cities as well? **D.2.4** **D.3.2.3**

BART Improvements - The DEIR indicates that improvements in peak period and peak hour BART service will be needed. As San Francisco has studied closely in relation to the finances of its Municipal Railway, such improvements are very expensive and are not ordinarily covered by the ordinary tax contributions of the development that necessitates them. We are concerned that the called for BARTD improvements not cause Berkeley users to pay increased fares nor degrade non-peak service levels. **E.2.7.1**

Questions: What is the cost of the BARTD improvements that are projected to accomodate C-3 employees' journey to work?

What are the taxes (property and sales tax) that C-3 development is projected to contribute to BART in 1990 and 2000?

To what extent will fare increases be needed to support the expansion of peak period and peak hour service? **E.2.1.2** **2.3**

To what extent will non-peak service suffer? **E.2.7.1** **E.2.7.4**

Transportation Capacity - The DEIR has forecast that East Bay traffic corridors will have excess peak-hour demand of 1,300 trip ends that would not be met. Since these corridors also are needed for journeys to work at Berkeley and East Bay locations, there is concern that C-3 development, by generating a major proportion of the capacity, is in effect rendering East Bay locations less accessible to one another and is thus pre-empting East Bay potential for its own development. **E.3.1**

Questions: What portion of East Bay demand is attributable to C-3 employees?

What increase in peak travel time between Berkeley and downtown Oakland, Vallejo and San Francisco can be expected because of congestion in 1990 and 2000? **E.1.4.2** **E.3.1**

Unemployment Reduction - The Downtown Plan and the DEIR give negligible attention to matching C-3 employment opportunities with the employment needs of the long-term unemployed and others at a competitive disadvantage in the labor market. The job training mitigation measure (V.C.5) does not suggest any public policies that would encourage employers, industry association or educational institutions to pursue the possibilities mentioned. In addition, this mitigation measure suggests that San Francisco residents would be the main target of such programs. **B.2.1** **B.5.2.** **B.5.5**

Question: To what extent will currently unemployed people in San Francisco and the rest of the region benefit from C-3 employment opportunities? **B.5.1** **B.5.2**

PROPOSED MITIGATIONS

In general, Berkeley's concerns are that the San Francisco Downtown Plan generates significant impacts that cross over San Francisco city limits into Berkeley and other jurisdictions in the Bay Area. Mitigations proposed in the DEIR are problematical because they:

- do not adequately address the regional impacts; and **B.2.1** **E.2.3** **E.2.4**
- generate regional costs. **D.3.2** **D.5** **E.3.1** **E.4.3** **E.6** **N.3** **P**

The purpose of our proposals are to assure that San Francisco mitigate the external costs and other impacts of the Downtown Plan. Because the DEIR did not provide us with full information about these impacts, we can only propose the mitigations in general, non-quantitative terms. Z.1

1. A Smaller Project- To a major degree, the impacts of the Plan on Berkeley's housing, population distribution and transportation derive from its scale. A Plan providing for significantly less development in the San Francisco downtown dould conceivably confine most impacts within San Francisco. B.2.2 D.3.2.4 Q.2

2. Housing Requirements - To the extent that San Francisco houses people who work in the C-3 District, Berkeley's housing and transportation facilities will not be subject to increased housing and transportation prices. Therefore, we propose that the Planning Commission consider requrements that developers provide housing for projected employee households. D.5.1 D.5.2

3. Regional Housing and Transportation Funds - For Berkeley to offset the displacement effects of the Downtown Plan - generated housing market pressures, funds are needed to assist low and middle income families to compete for Berkeley housing. Similarly, the costs of increased peak-period BARTD service need to be supported by the C-3 District land uses that generate the need, rather than by increased fares which would be paid by all riders in the region. D.5.2 E.2.7.2 E.2.7.4

4. Project Phasing - To assure that C-3 development is in balance with the region's housing and transportation, the Plan should permit development to proceed only when these support systems are adequate. The Downtown Plan, therefore, should include a phasing system that maintains a continuous balance. P.2

5. Employment Targeting - To reduce pressures on the housing market and displacement, public policies are needed to prepare and match the currently unemployed and underemployed people in the region with the employment opportunities that the Downtown Plan will provide. B.5.5

cc: Mayor and City Council
City Clerk
Planning Commission
Transportation Commission

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DEPT. OF CITY PLANNING

June 1, 1984

OUR FILE

HAND DELIVER

Mr. Alec Bash
Office of Environmental Review
Department of City Planning
450 McAllister Street
San Francisco, California 94102

Comments to Draft Downtown EIR

Dear Mr. Bash:

On behalf of our clients whose properties will be affected by the proposed preservation policies in the Downtown Plan, we offer in this letter our comments to the Draft Downtown Environmental Impact Report (DEIR). **Z.1**

We are aware that many citizen organizations are carefully scrutinizing the DEIR. We believe that the likelihood of a legal challenge by one of these organizations approaches a certainty. We are optimistic that the concerns of our clients will be addressed adequately by the Planning Department ("Department"), its Commission ("Commission"), and the Board of Supervisors ("Board"). Consequently, we share the City's interest in assuring that the final Downtown EIR is not subject to lengthy litigation. Our comments are intended to further our common goal. **Z1**

You should note that these comments relate only to a small portion of a lengthy environmental document./1/ The Department staff and its consultants have produced a document which charts new grounds by utilizing a realistic and sophisticated methodology for cumulative and regional transit impact analyses. This new methodology will serve the City well in future environmental review processes for individual projects. We applaud the Department for its substantial effort.

S.2

/1/Our comments on policy considerations and legal issues raised by the Downtown Plan and its implementing legislation which are outside the scope of the California Environmental Quality Act ("CEQA") will be addressed in a separate letter.

Our comments are set forth below:

1. During the April 26, 1984 public hearing on the Downtown DEIR, Mr. Rosenblatt announced that the comment period on the DEIR would be extended to June 4, 1984. However, at the beginning of the same hearing, Mr. Robert Passmore informed the Commission that the Department will present revisions to the Downtown Plan on June 7, 1984. Furthermore, a public hearing on the proposed Planning Code revisions and Master Plan Amendments related to the Downtown Plan ("Amendments") will be held on June 28, 1984. S.1.3 S.1.4

The Doctrine of Exhaustion of Administrative Remedies requires that all issues be raised during the DEIR comment period, prior to seeking any judicial review of the FEIR. This Doctrine is designed to allow an administrative body to correct any error, thereby precluding litigation. Correlatively, the public's ability to raise all relevant issues depends on a prior full disclosure of all aspects of a proposed project and, in the case of the Downtown Plan, the Amendments. To fail to include the Amendments is to create a legally deficient project description. S.1.4

Under the proposed scheduling, the text of the Amendments will be available to the public only after the close of the DEIR comment period. We suggest that the comment period be extended for some reasonable period following public availability and distribution of the Amendments. This would insure that the comments on the DEIR properly are addressed to the "project", i.e. all proposed actions to be undertaken by the Commission to implement the Downtown Plan. S.1.3 S.1.4

In other respects, the project description of the DEIR appears either incomplete or in error. For example, there are substantive differences, between the text of the Downtown Plan and the proposed implementation legislation (e.g. the use of transferable development rights). The DEIR does not address these differences. S.1.4

The failure to timely respond to these issues ultimately will require subsequent time-consuming corrective actions. The environmental process may be unnecessarily lengthened as a result of the need to conduct such further review, to provide yet another comment period and to respond to those new comments. We seek to avoid such potentially disastrous delay. S.1.3 S.1.4

2. On May 22, 1984, the Commission conducted a public hearing wherein affected property owners were provided an opportunity to contest the proposed designations of significant and/or contributory buildings and the boundaries of proposed conservation districts pursuant of Article 11 of the proposed Downtown Plan implementation legislation. In our opinion, the designation

of each structure as significant or contributory is a separate discretionary action by the Commission. As such, each designation is a "project" within the meaning of CEQA. The environmental review process must be completed before the Commission may act on the designation of any structure or district. In this case, the environmental review process is the Downtown EIR. **S.1.3** **S.1.4**

Under the present procedure, an affected property owner is required to voice his/her objection on the merits of the proposed designation before the requisite environmental review process has been completed. This procedure contravenes CEQA. **S.1.3** **S.1.4**

Further, affected property owners are required to register their objection based on a proposed ordinance, which ordinance is not covered in its entirety in the DEIR, and further which is still undergoing further revision and environmental review./2/ **S.1.3** **S.1.4**

Since the responses to comments will contain further clarification of issues raised and may add new information on the impacts of the proposed preservation policies, the affected property owners should not be put in the untenable position of having to participate in adjudicatory hearings on the designation of their buildings without the benefit of the responses to comments and without the benefit of the final adopted standards to be employed for such designation. A certified final EIR, as an informational document, will provide the needed information for the Commission and the Board to balance the environmental effects of the project against other private and public interests. It is also the document which provides information to affected property owner to realistically assess the effects of the proposed designations. Therefore, any hearing which designates a particular building as significant or contributory before the conclusion of the environmental review process or which defines a potential conservation district violates both the spirit and substantive provisions of CEQA. **S.1.3** **S.1.4**

3. The DEIR does not discuss the potential impacts of the alteration requirements on the safety of people who work and

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/2/During the DEIR hearing, the Department received numerous comments on the alleged deficiency of the DEIR with respect to the proposed preservation policies. Many of the organizations and individuals informed the Department that they would submit detail comments in writing. Therefore, although we attended the DEIR hearing, we are unable at this time to determine if any of those comments may contain valid criticism and to offer our suggestions to the Department.

reside in San Francisco. Section 104 F of San Francisco Building Code requires that certain structures be brought into compliance with seismic safety requirements. The effect of the standards and procedures for alteration of buildings under proposed Article 11 in relation to §104.F of the San Francisco Building Code should be addressed. **K.1**

Based on the foregoing, the Commission and the Department should review the procedures employed for environment review and implementation of the Downtown Plan's preservation policies. We strongly urge you to consult with the City Attorney and Mr. Mihaly and to take all necessary steps to avoid potential litigation over the legal sufficiency of the Downtown EIR. We recognize that the environmental review process for the Downtown Plan has been a lengthy one. It is not our intent to further delay the certification of this very important document. We will be happy to meet with you and your counsel to further discuss the above issues and other problems arising out of the Downtown EIR. **S.2**

Sincerely,

Timothy A Tosta

TAT/lb

cc: Mr. Dean Macris
Mr. George A. Williams
Ms. Barbara Sahm
Mark Mihaly, Esq.

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THRESHOLD
INTERNATIONAL CENTER FOR ENVIRONMENTAL RENEWAL

DEIR

June 1, 1984

Dear fellow citizens:

We wish to be counted among those interested in the ecological
transformation of cities who feel San Francisco deserved better S.3
value for the cost of the study under review.

A certain air of unreality stems from the document's omissions
or naiveté concerning current land speculation in the City &
County and its fierce, notorious pressures of high rents,
scarce housing, imbalanced taxation and overcrowded services —
popularly known as Manhattanisation. We concur in the judgment
that too much diversity and quality of life has recently been
squeezed out of the historic Downtown, and waterfronts, by B
high-rise development's environmental impacts, commuter volumes D.2.1
and merchandising homogeneity. D.2.3

This is a time for regional planning with respect to single-
purpose commuter sitings, such as dense office concentrations A.4
Downtown or South of the Slot. N.3

We commend the report's ideas for implementing modes of clean
transit, facilitating and popularizing their use. Regrettably,
however, insufficiencies and inaccuracies of transportation
data, extrapolations and projections render the study inadequate
as a reliable planning resource. Similiarly, though alert to
landmarks, the study misses the massive environmental transition A.1
before our eyes. Finally, in our view, the plan is rather C
deficient with respect to imperatives of wiser energy and E.1
resource use, and recycling. E.2

2.1

Mindful of the happiness and welfare of our present human
populations, and of the need to maximize for other species the
carrying capacity of this place and the region, we would
recommend rejection of this report, and wish for fuller
dimensions and greater public participation from investments S.1
of this scale in San Francisco's planning process. S.2

Sincerely,

John Diamante
Vice president

SAN FRANCISCO PLANNING COMMISSION

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295 Eddy Street, San Francisco, CA 94102 (415) 474-2164

June 1, 1984

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Toby Rosenblatt, President
San Francisco Planning Commission
450 McAllister Street
San Francisco, CA 94102

DOWNTOWN PLAN EIR COMMENTS

Bradford Paul

Dear President Rosenblatt,

On April 26th I testified as to the North of Market Planning Coalition's comments
on the Downtown Plan EIR. This represents the written comments I spoke of at that Z.1
time. I would like to begin by summarizing my oral testimony.

While our organization has a number of concerns about specific shortcomings of the B.2.1 B.2.2
EIR that relate to the Tenderloin/North of Market area we share the concern expressed D.3.1
by most of the speakers at the April 26th hearing that the major shortcoming of this D.3.2.3
document is its lack of a broader vision of the regional impacts of uncontrolled high- E.1.5
rise growth in downtown San Francisco. E.1.9
N.3

Let us examine, for a moment, the case of Janice, a NOMPC member and a former resident
of the Tenderloin. As residential hotel rents escalated in the Tenderloin she moved
to Oakland where she thought she might be able to stretch her SSI disability check
further. In so doing she joined countless low-income families and individuals displaced
by wealthier office workers who outbid them for their housing. In this way the East Bay
gets a double whammy from San Francisco highrise development....they must provide housing B.4.2
for those new office workers moving to the Bay Area to take new jobs Downtown who settle D.3.2.3
in the East Bay and they are inundated by low-income refugees from San Francisco displaced
by new office workers moving to the Bay Area and settling in San Fracisco. Z.1

With so much private sector investment and planning happening on a regional level (i.e.
Southern Pacific/Santa Fe projects in San Francisco, Berkeley and Tiburon) it is time
City Planning in San Francisco analyzed regional impacts of the Downtown Plan and actively
consulted with other planning agencies in the nine Bay Area counties on these issues. B.2.1
B.2.2
D.3.2.1
N.3

EXISTING HOUSING

Section IV. of the EIR, Environmental Setting and Impact, makes a number of statements about the preservation of existing housing that fly in the face of all we know about this subject. Beginning on page IV.B.52 we find statements such as:

[ADDITIONAL MATERIALS WERE SUBMITTED WITH THIS LETTER AND
ARE AVAILABLE FOR REVIEW AT THE DEPARTMENT OF CITY PLANNING,
450 McALLISTER STREET, 5TH FLOOR.]

~~The other effect of the Plan on C-3 District housing development arises because of policies which would directly affect other types of development, particularly office. Policies limiting development in Subareas 1 and 6 north of Market Street and redirecting development into Subareas 1, 2, and 6 south of Market Street would increase competition for available sites in all of these areas. Generally, it would become more difficult for housing to compete with commercial land uses for sites in these subareas.~~

~~As a result of both of these considerations, about 60 percent of the C-3 District housing forecast to be built from 1990 to 2000 would be developed in Subareas 3, 4, 5, and 7. Among these subareas, the largest number of units would probably be added in Subarea 5. Although the Plan policies encouraging housing do not necessarily apply in Subarea 7 (since most of it would be taken out of the C-3 District and included in the Chinatown Special Use District for which policies have not yet been proposed), it is assumed that a relatively small amount of new housing would be allowed and would be built there. A relatively limited amount of housing is forecast for Subarea 1, probably to be incorporated in a large, mixed use project(s). No new housing is forecast for Subareas 2 and 6 although some of the housing forecast for Subarea 1 could occur in these areas instead.~~

~~There are proposals to expand the supply of housing in several areas adjacent to the C-3 District. These proposals are not specific to the Downtown Plan but include projects from other plans and rezoning studies and are incorporated in the citywide Housing Element. Since these projects would not be built in the C-3 District, they are not included in the forecasts in this section. Instead they are addressed as a part of the citywide analysis of housing for C-3 District workers which is presented later in this EIR. (See Section IV.D, Residence Patterns and Housing Impact)~~.

Existing Housing. The forecasts of C-3 District housing in 2000 assume that there are no changes in the 1990 stock of housing. For residential hotels, it is assumed that the Residential Hotel Conversion and Demolition Ordinance would continue to protect the existing residential hotel units in the C-3 District. For other housing, there were two different assumptions about future policies. **Z.1**

In making the statement "For residential hotels, it is assumed that the Residential Hotel Conversion and Demolition Ordinance would continue to protect the existing residential hotel units in the C-3 District" the EIR ignores the fact that this ordinance is so structurally flawed as to be virtually useless. It is the recent slump in tourism, not the Residential Hotel Conversion and Demolition Ordinance, that has prevented greater losses and unless those structural flaws are corrected an upturn in tourism could wipe out thousands of units of affordable housing. **B.4.2**

The flaws in the Hotel Conversion Ordinance fall into three major categories. They are:

- o STANDING TO CHALLENGE A CONVERSION
- o SUMMER/WINTER CONVERSION MECHANISM
- o 40% OF REPLACEMENT COST BUYOUT PROVISION

The Standing section of the current ordinance defines who has a right to challenge an illegal conversion of a residential hotel unit. If one remembers that the final ordinance was full of amendments drafted by residential hotel owners the twisted logic of this section becomes clearer. Only current residents of a hotel have standing to challenge. One exception is made for tenant and neighborhood groups who represent 3 or more tenants who have lived in the hotel within the last 90 days. Current tenants can easily be bought off or intimidated. Finding three former tenants who have left an illegally converted hotel within the last ninety days can be equally frustrating. **B.4.2**

In one case the Planning Coalition thought they had located three such tenants only to have the Bureau of Building Inspection rule that one of the three could not provide documentation more recent that 95 days. **B.4.2**

Most ordinances of this type give the City standing as a matter of course and will often include community groups like the North of Market Planning Coalition, the Chinatown Neighborhood Improvement Resource Center, the Telegraph Hill Dwellers, etc. The first ordinance adopted by the Board of Supervisors had it, the amended version in June of 1981 narrowed the definition of who had standing to the present language. **B.4.2**

A clear example of the absurdity of the current ordinance can be seen in the case of the St. George Hotel. Formerly the P & W Hotel, the St. George situated at the southeast corner of Leavenworth and Eddy is 100% tourist when its BBI approved Unit Usage Report states that it is 100% residential. **B.4.2**

The former managers of the P & W illegally evicted the 35+ permanent residents in 1982. Late one Friday afternoon, about 5:00 p.m., a resident appeared at our office with her baby. She was crying. The manager and his wife had ordered her to leave the hotel. No 30 day eviction notice, no unlawful detainer, just a "get out or else". When she argued with them the husband (manager), in her words, "grabbed me by the arm, shook me and pushed me down the front stairs". Sara Colm and I walked her back to the hotel and managed to flag down two S.F. Police officers to go in with us. The officers found the manager and his wife drunk, and abusive. They called the owner from the manager's room and warned him that if he did not follow the law in eviction matters they would arrest his managers and him. As a result the remaining tenants (5) were offered $300 in moving expenses which they gladly accepted to get away from those managers. B.4.2

Several months later the owner of the P&W leased the hotel to a gentleman who had operated a hotel around the corner as a tourist hotel for younger, college age, Western Europeans. The fact that that violated the Residential Hotel Conversion and Demolition Ordinance by changing the use from the official 100% residential to the illegal 100% tourist didn't seem to phase the owner. B.4.2

Neighborhood groups found out about this illegal conversion more than 90 days after the last tenant had fled. Since no one could round up the three former tenants who had lived there less than 90 days ago no one could challenge this clear violation Z.1 of the law. NO LAW THAT WAS MEANT TO BE EFFECTIVE WOULD BE WRITTEN IN SUCH A WAY. B.4.2

FOOTNOTE #1: By accident, the manager of the P&W (now the St. George Hotel) allowed a tenant to stay beyond the 30 day period necessary to establish legal status as a tenant, and thereby standing to challenge the conversion. The case was brought before the Bureau of Building Inspection. Alas, after two years of flaunting the law we thought we would get some justice in the neighborhood. It was not to be. BBI ruled that the tenant could only prove he had been a tenant for 28 days...end of challenge. BBI did say that the owner would eventually get the message that the conversion was illegal and "smarten up". THE ONLY MESSAGE THE OWNER GOT WAS THAT IF HE SMARTENED UP AND NEVER AGAIN LET A TENANT STAY BEYOND THIRTY DAYS HE COULD BREAK THE LAW FROM NOW UNTIL THE YEAR 3000. B.4.2

FOOTNOTE #2: Community groups have been trying to remedy these structural flaws in the hotel conversion ordinance for over two years(see attached flyer) with no results. Most of that time a set of amendments, many of which BBI supports, have been bottled up in the City Attorney's office. More recently they have been held up pending environmental review by the Office of Environmental Review, Department of City Planning. B.4.2

THE DOWNTOWN PLAN EIR MUST LIST THOSE AMENDMENTS NECESSARY BEFORE THE RESIDENTIAL HOTEL CONVERSION AND DEMOLITION ORDINANCE CAN BEGIN TO PROTECT THE CITY'S STOCK OF AFFORDABLE RESIDENTIAL HOTEL ROOMS. B.4.2

The summer/winter conversion section of the existing ordinance allows an owner to rent any vacant "residential" rooms as "tourist" rooms during the summer months. Unfortunately, the ordinance defines summer as five months and thereby encourages owners to stop renting residential rooms several months before the beginning of summer (May 1) to guarantee those rooms will be available to rent to tourists for six months of the year. RESULT: THIS ORDINANCE IS LITERALLY NOT IN EFFECT FOR FIVE TO SIX MONTHS OF THE YEAR. B.4.2

Finally, the current ordinance allows owners to buy out of "residential units" by paying 40% of the replacement cost. Currently real estate values in Chinatown/Manilatown and some areas South of Market make such an arrangement attractive to highrise developers. But 40% of the replacement cost of a unit does not, by definition, replace a unit. Soon this may no longer be an effective deterent to conversion in the Tenderloin either. Again, an amendment addressing this problem was proposed two years ago. B.4.2

SPEAK OUT

The North of Market Planning Coalition's

RESIDENTIAL HOTEL TASK FORCE

invites you to attend two

PUBLIC HEARINGS

with the San Francisco

BOARD OF SUPERVISORS

to

STRENGTHEN THE HOTEL CONVERSION LAW!

1st Hearing: **SPEAK OUT!**

WHAT: The Planning, Housing, and Development Committee of the Board of Supervisors will hear testimony on the effectiveness of the Residential Hotel Law.

WHEN: Tuesday, July 20, 1982, 2:00 p.m.

WHAT: The Planning, Housing, and Development Committee of the Board of Supervisors will hear testimony on the effectiveness of the Residential Hotel Law.

WHEN: Tuesday, July 20, 1982, 2:00 p.m.

WHERE: Planning, Housing, and Development Committee of the Board of Supervisors
City Hall, Polk and McAllester, Room #228

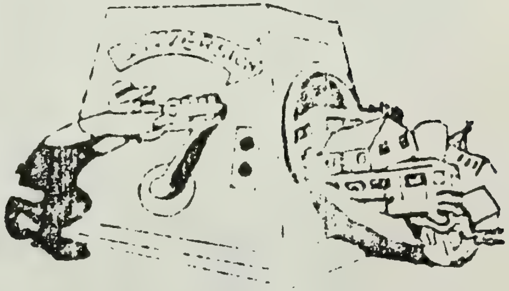
2nd Hearing: *THE BOARD VOTES!*

WHAT: The full Board of Supervisors will then vote on proposed amendments to strengthen the law.

WHEN: Monday, July 26, 1982, 2:00 p.m.

WHERE: Board of Supervisors Chambers
City Hall, Polk and McAllister, 2nd Floor

STOP THE CONVERSIONS!



FOR MORE INFORMATION, CONTACT:
NORTH OF MARKET PLANNING COALITION
295 Eddy Street San Francisco CA 94102 (415) 474-2164

The next paragraph in Section IV. on page IV.B.52-53 states that for housing other than residential, "there were two different assumptions about future policies". In fact, all four paragraphs on the next page (IV.B.53) contain major flaws, assumptions that directly contradict the facts. We would like to take those paragraphs one at a time. **B.4.2**

PARAGRAPH ONE

> IV. Environmental Setting and Impact
>
> The Downtown Plan proposes that several areas within the current C-3 District with large amounts of housing be removed from C-3 District zoning (see discussion of boundary changes at the beginning of this section). About 45 percent of C-3 District housing space in 1990 would be included in these rezoned areas./75/ The zoning for this housing would be changed to the North of Market Mixed Use District (about 60 percent), to the Chinatown Special Use District (about 40 percent), or to RC-4 or RM-4 (small amount). The 2000 forecasts assume that the policies adopted for these zoning districts would either protect existing housing from conversion and demolition or require that existing housing be replaced with units similar to those removed. **Z.1**

This paragraph assumes that policies adopted in the North of Market Mixed Use District proposed for our neighborhood "would either protect existing housing from conversion and demolition or require that existing housing be replaced with units similar to those removed". To contradict the ability of NOM MUD zoning(as proposed at the time the Downtown Plan EIR was published) to accomplish either of these goals we submit:

- North of Market Zoning Analysis, Asian Neighborhood Design, 1984.
- NOMPC's Negative Declaration Appeal on NOM MUD in a letter to the Commission dated April 9, 1984
- A transcript of the April 19th NOM MUD Neg. Dec. Appeal
- NOMPC letter to Bob Passmore (5/7/84) on replacement housing provisions of the NOM MUD proposal **B.4.2**

PARAGRAPH TWO (Page IV.B.53)

> For the housing remaining under C-3 District zoning (about 55 percent of the 1990 housing space), the forecasts assume that Plan policies would protect existing housing. The Plan recommends that an ordinance regulating demolition or conversion of these units should be considered. Pending adoption of such an ordinance, demolition and conversion would be subject to conditional use review./76/ It is assumed that existing housing would be protected or replaced by similar units as a result of either an ordinance or conditional use review. **Z.1**

This paragraph assumes that "Plan policies would protect existing housing" and goes on to recommend passage of an ordinance that would regulate conversion and demolition of existing housing units. **Z.1**

First, we have been hearing about this proposed ordinance for years. One was drafted several years ago and sent to the municipal equivalent of Siberia, the City Attorney's office. If that office ever does approve such an ordinance it will probably suffer from the same shortcomings as the Residential Hotel Conversion and Demolition Ordinance, lack of enforceability. To assume, as the Downtown Plan EIR does, that existing units "would be protected or replaced by similar units as a result of either an ordinance or conditional use review" is wishful thinking. **B.4.2**

THE WORTHLESSNESS OF CU REVIEW..THE 41-55 OSGOOD CASE

Several months ago I brought the case of 41-55 Osgood to the Department's "enforcement" staff, Nancy Gin, at a Board of Permit Appeals hearing. It is a clear violation of the interim RC-4 North Beach Re-Zoning. I brought this to the Zoning Administrator's attention in a letter dated April 25, 1984 and spoke about it extensively in my oral comments at the Downtown Plan EIR Hearing on April 26th. To my knowledge no action has been taken by Department staff on this matter. **B.4.2**

As you know, we were told in the 1000 Montgomery case that you lacked the tools to prevent that conversion; i.e. conditional use. That project had just missed being covered by the North Beach rezoning. When I presented a survey of 350+ units of affordable housing located in the block south of Broadway that was vulnerable to conversion you included that area, including 41-55 Osgood, in the extended North Beach RC-4 rezoning. YOU HAVE THE TOOLS FOR ENFORCEMENT YET THEY ARE NOT BEING USED. The attached letter to Bob Passmore describes the illegal conversion in detail. **B.4.2**

PARAGRAPH THREE

> If these assumptions about existing housing remaining in the C-3 District are not met, some housing could be lost. Units under most pressure would be those in small buildings, surrounded by non-residential uses, in locations where commercial demand would be strong (Subareas 1 and 6) or where most development would occur (Subareas 1 and 2). Z.1

The first sentence states, basically, that if our assumptions are wrong "some housing could be lost". How much is "some"? Is it dozens of units, hundreds of units, thousands of units? "Some", in this context, is a meaningless term. It needs to be defined. In our experience the assumptions are weak at best and even if they are met we will lose thousands of units of affordable housing in the short term through the lack of enforcement of the Hotel Conversion ordinance, the lack of a Residential Conversion Ordinance , the lack of enforcement on C.U. provisions in existing RC-4 areas... North Beach, Upper 24th St., Hayes Valley, Upper Market, etc. B.4.2

The most glaring deficiency in this section of the EIR is the lack of discussion of the Rent Stabilization Ordinance and the effect of Vacancy Decontrol on the preservation of affordable rental housing. This so-called safety valve in our rent control ordinance, which allows below market rents to float to market rate when units are voluntarily vacated, undermines the very purpose of rent control by encouraging landlords to evict long term tenants. B.4.2

Put yourself in the place of a landlord in the Tenderloin renting residential hotel rooms. You have tenants who moved in five years ago that are paying $80-$100 a month rent today and you know you can rent vacant rooms for $280. If you understand real estate you know that:

- o For each tenant who "voluntarily" leaves their $80/month room and is replaced by someone paying $280 the owner realizes $200/month in additional income. That translates into $2,400/year.
- o ONE TURNOVER translates into an increase in property value of $16,800 to $24,000 (using 7 to 10 times gross multipliers).
- o SIX TURNOVERS INCREASE CASH FLOW BY $14,000 PER YEAR BUT INCREASE PROPERTY VALUE BY $100,800 TO $144,000. B.4.2

Add to this equation the fact that the Mayor recently signed legislation reducing annual rent increases on occupied units from 7% to 4% (while vetoing vacancy control) and you have a blueprint for disaster in the form of a dramatic increase in eviction notices to long term tenants. The proof is in the pudding as they say and the pudding is attached...a Wed.,May 2,1984 S.F.EXAMINER story documenting a SIX FOLD INCREASE IN EVICTION CALLS TO THE S.F. RENT BOARD. The Downtown Plan EIR is silent on this issue.
B.4.2

PARAGRAPH FOUR

> Separate from changes in the numbers of units and amount of housing space, there is the question of changes in the prices and rents and in the quality of existing C-3 District housing. Although some change is possible, existing C-3 District housing would continue to be among the City housing with lower than average rents and prices. The main reasons are because the downtown housing stock is older, unit sizes are relatively small, and City policies concerned with preserving housing of this type would be adopted. **Z.1**

This paragraph is clearly meant to downplay the impact of downtown development with a statement that regardless of what happens "existing C-3 District housing would continue to be among the City housing with lower than average rents and prices". On its face this is a rather meaningless statement because average rents citywide could go to $1,000 per month, Tenderloin units could average $800 a month, the statement would be a) true and b) of little comfort to the tens of thousands of San Francisco residents displaced. **B.4.2**

Furthermore, if you calculate C-3 rents on a per square foot basis, particularly in residential hotels and studio apartments, you will find that C-3 rents are among the highest in the City. **B.4.2**

NEW HOTEL DEVELOPMENT

New hotels appear to be exempt from housing mitigation requirements in the Downtown Plan EIR. WHY? The City recognized the negative impacts of hotel development in the now famous RAMADA/HOLIDAY INN/HILTON package. The City points to these mitigations with pride in the new RESIDENCE ELEMENT. Our "Rings of Impact" analysis of those hotels hold for any new hotels in the C-3 area. **B.4.2**

Just look at the impact of the current Ramada Hotel nearing completion. Half the vacant buildings in our neighborhood are within 100 feet of the Ramada. The Empress, Mason and Zee hotels, containing a total of more than 250 units, sit empty as owners speculate on the land. All sit with highly inflated purchase prices because they are, in their owners words, "half a block from the Ramada Renaissance Luxury Hotel". This direct loss of 250+ plus units cuts the RAMADA UDAG REHAB HOTELS contribution of housing from 450 units to 200 units. **B.4.2**

THIS ISSUE CANNOT BE IGNORED IN THE DOWNTOWN PLAN EIR. THE INFORMATION IS AVAILABLE AS TO THE IMPACTS OF HOTEL DEVELOPMENT ON AFFORDABLE HOUSING. THE ABOVE IS ONE EXAMPLE. **B.4.2**

You cannot legislate that people cannot keep their buildings off the market in anticipation of speculative profits in the future. What you can do is anticipate this kind of behavior and mitigate it (a la O/HPP) or take away the incentive in the form of highrise development through a 500,000 sq. ft. annual limit. **P.1**

VAN NESS PLAN

There is insufficient discussion of the Van Ness Plan and its relationship to affordable housing. Requiring 3 FAR residential for every FAR commercial doesn't mean much to Tenderloin residents or 80-90% of city residents if that "residential" means $150,000 plus condos. That is not sufficient trade-off for significant amounts of new office development along Van Ness on our western boundary. **B.4.2**

ANNUAL LIMIT ON NEW COMMERCIAL OFFICE DEVELOPMENT IN SAN FRANCISCO

Section V.D.2 of the EIR talks about an Annual Limit as mitigation. The language in this section dances around the real issues. For instance, in the first paragraph we find:

> From the perspective of the City's housing market, less employment growth would mean less increase in the competition for San Francisco housing. Limits on office development would have less effect on the competition for City housing than on employment growth, however. The demand for housing is influenced by other factors besides place of work and not all of those newly **Z.1**

We find here the statement "less employment growth would mean less increase in the competition for San Francisco housing". (The phrase "competition for S.F. housing" appears to be a sanitized version of "displacement" and "gentrification"). Several paragraphs later we find the statement: "Less employment growth would mean somewhat less increase in the competition for San Francisco housing". The further qualification of the statement by the addition of "somewhat" is never explained but appears hereafter. While it is a small point it serves to illustrate the subtle but disturbing bias found throughout the report that reflects a lack of political will to address the real need for "control" of downtown growth as opposed to making it prettier and shifting it South of Market. **B.4.2** **D.3.1** **D.5** **D.5.4**

SUMMARY

The real issue that should have been addressed in this EIR is how much development can our housing and transit infrastructure absorb on an annual basis. That would have told us where we should be headed in terms of annual limits. If we could improve on housing production or transit capacity we could adjust the annual limit up and if we couldn't meet current projections we could adjust down. Such a rational approach to planning steps on too many powerful political interests,however, so we are left with an inadequate EIR. **P.1** **P.2**

SAN FRANCISCO
CHAMBER OF COMMERCE

June 6, 1984

SUBJECT: Downtown Plan EIR

Toby Rosenblatt
President
Planning Commission
450 MCallister Street
San Francisco, CA 94102

Dear Toby:

While the Downtown Plan EIR represents the most comprehensive culmulative analysis of the impact of future development, there are several issues which need further analysis or clarification. The following comments on the environmental setting and impacts should be addressed prior to certification of the Downtown Plan. **Z.1**

DOWNTOWN PLAN COST IMPLICATIONS FOR EMPLOYERS

The Downtown Plan EIR alludes to the fact that office rents will be increased as a result of the proposed zoning ordinance and the impact will be greater upon small rent sensitive office activities and large space using functions. Only in Appendix D is an attempt made to quantify the employer cost implications of the Downtown Plan. In this instance, the economic consultants estimated construction cost per gross square footage increase to be 10% or $16.61 (8% for 3 building set backs and sloped roof; 1% for art work; and 1% for roof terrace and facade treatment). While the prototype building cost estimate contemplates using TDRs to reach maximum permitted building envelope, it fails to calculate the cost to purchase TDRs. In addition, the cost calculation does not take into account additional costs built into the Downtown Plan, such as the Transit Impact Development Fee, OHPP, and open space requirement. **B.3**

The failure to explicitly state the employer cost implications of the Downtown Plan raises serious public policy issues. Public policy decision makers for the Downtown Plan -- Planning Commission, Board of Supervisors and Mayor -- and other City officials -- Controller and Mayor's budget office, Private Industry Council, and Mayor's Office of housing and Economic Development -- must be provided comprehensive cost data regarding the employer exactions because it may have effect on a number of other issues facing the city. The pyramiding of taxes / fees (e.g. OHPP, transit impact, open space, art), requirements (e.g. design, FAR and height reductions) and hidden costs (e.g. TDR -- in effect the purchase of land in two places) will significantly raise the cost of space to employers. In our opinion, this will exacerbate the gentrification of the work force and lesson the diversity of job opportunities for San Francisco residents. It may also have long term fiscal implications for the City. **B.3 Z.3**

The Downtown Plan EIR should provide a more explicit discussion of the cost ramifications as it relates to:

A. The retention of corporate back office functions

B. The creation and expansion of small businesses

465 CALIFORNIA STREET, 9TH FLOOR
SAN FRANCISCO, CA 94104, (415) 392-4511

C. The diversity of entry level and career development employment opportunities that correspond to the City's demographic profile (an issue of concern to the Private Industry Council) **B.3** **B.5.1**

During the development of the Strategic Plan, Rudy Nothenberg, then Deputy Mayor for Finance and John Farrell, City Controller, both expressed concern that no one in the City was calculating the impact of the special Downtown Plan employer exactions and the effect on general City revenues (e.g. property taxes, business taxes -- payroll and gross receipts). Assessor Sam Duca in a letter to Mayor Feinstein during the Planning Commission's debate on the moritorium also expressed fear that the property tax increases from commercial development would evaporate and jeopardize the City's general fund revenue picture. A significant portion of the City's budget surplus is derived from the increase of property taxes due to new commercial development and employment growth increasing payroll tax revenues. To date, Mayor Dianne Feinstein and the Board of Supervisors have utilized a portion of the surplus to, in effect, mitigate development impacts by establishing a $10 million housing fund, using $21 million to purchase 60 Muni vehicles, and to apply $47 million to improve and maintain our infrastructure. Will the employer exactions contained in the Downtown Plan act as a disincentive to commercial development and employment growth thus reducing future general fund revenues? According to a 5-year fiscal forecast, the City's rate of expenditures exceeds revenues. Will the employer exactions have a significant impact on commercial development and employment, thus forcing the City into a budget crisis? These long range fiscal implications of the employer exactions must be addressed. **B.3**

The Chamber of Commerce in 1981 commissioned Deloitte, Haskins and Sells to conduct a comparative study of business taxation by local governments in California. The study results show that businesses in San Francisco pay higher taxes and user charges than businesses in other areas reviewed. Reasons for this include higher payroll taxes (San Francisco is the only city which assesses a tax on payroll), higher property values, higher transient lodging taxes, and higher sewer user charges. A similar comparative study carried out in 1984 by the Los Angeles Taxpayer Association concluded that San Francisco continues to have the highest taxes on businesses. I am enclosing some summary materials from the D H & S study. **B.3**

We request that the EIR address the employer cost impacts of the Downtown Plan utilizing the enclosed Annual Employer Cost Matrix. This matrix will explicitly calculate the employer cost exactions and provide comparative rent/employer cost exactions analysis with our competitor cities in the region. The cost analysis should state the assumptions for the calculations (e.g. the EIR open space assumption is 80% on site and 20% off site). The employer cost exactions should be calculated on a square foot basis, then converted to a rental charge per employee based upon the space utilization data provided in the EIR. I am including an analysis conducted by the Chamber of Commerce on the cost implications of Guiding Downtown Development that may be helpful in stating the assumptions, indicating methods of calculation and showing how a developer will treat the exactions in terms of tenant rent costs. Should you require assistance in calculating these employer tions we will be glad to work with you staff. **B.3**

ANNUAL EMPLOYEE COST MATRIX

	C-3-0	C-3-0(SD)	C-3-S	Oakland	Concord
Basic Rent					
Transit Impact					
OHPP					
Open Space					
Art (1%)					
Design Setbacks					
TDR					
FAR reduction					
Sub-Total					
Payroll tax (1.5%)					
Other exactions					
Total					

COMMENTS: ENVIRONMENTAL SETTING AND IMPACTS OF DOWNTOWN PLAN

Transportation and Circulation

1. Table IV.E.4, page IV.E. 36, identifies an excess travel demand of 1,000 autos by year 2000 along the Peninsula Corridor. In order to adequately assess the Downtown Plan's impact to transportation along the Peninsula Corridor, an alternatives analysis must be conducted. **E.2.3**

Senate Concurrent Resolution Number 74 (SCR 74) would require the Metropolitan Transportation Commission (MTC) to study the San Jose-San Francisco Highway 101 Corridor, and to submit a mass transit system plan/incremental improvement plan and to evaluate rail transit improvement options to the California Legislature no later than March 1, 1985. Resolution 74 has passed the Senate and is awaiting a hearing in the Assembly Transportation Committee. This measure would identify cost-effective staged improvements to accommodate projected travel demand identified for the San Jose-San Francisco Corridor. SRC 74 represents significant progress in setting public policy that will mitigate excess travel demand projected for this corridor. **E.2.3**

2. The fourth paragraph on page IV.E.28 of the Plan DEIR notes "AC Transit demand has been assumed to remain at 1990 levels since no improvements to transbay service are proposed to occure between 1984 and 2000 ...". Also, Table IV.E.4 on page IV.E.36 identifies an excess peak hour travel demand of 1,300 autos for the East Bay Corridor by year 2000. Mr. David Yazhari, Acting Senior Transportation Planner for AC Transit, has indicated that AC Transit would likely provide additional service to accommodate excess travel demand identified for year 2000 (telephone conversation, April 9, 1984). The Plan DEIR should be reviewed and as necessary revised to reflect increases in potential capacity for the transbay portion of the East Bay Corridor. **E.2.4**

3. Initiate a feasibility study for expanding jitney service along selected San Francisco transit corridors. This measure is intended to provide additional short-term capacity along transit routes. **E.6.2.2**

4. The proposed annual growth monitoring report (page V.E.1) should be extended to a period of not less than three years and the report's scope should be comprehensive. **P.2.3**

As now proposed, the monitoring report's time frame is too short to accurately assess effectiveness of improvements to Muni. A longer time frame should be used particularly if the report findings are intended to serve the basis of permitting further office development. The report's scope should also include evaluation criteria which measure progress toward the employment (Private Industry Council), housing and fiscal goals of the Downtown Plan, not just the transportation objectives. **P.2.3**

The Mayor's Fiscal Advisory Committee (MFAC) is reviewing a fiscal indicators reporting system that will provide a fiscal forecast, measurement of key financial and economic factors. The City Controller's annual consolidated budget report is another portion a comprehensive "state-of-the-City" report. The Planning Commission's proposed growth monitoring report must be integrated with the MFAC and Controller work. **P.2.3**

5. Proposed mitigation number 41, page V.E.26, calls for implementation of the

Downtown Plan's arcades proposals and through-block pedestrianways. This mitigation should be linked to the Plan's open space requirements and provide developer incentives (such as relief from height district regulations) in exchange for implementing proposals for the arcades and pedestrianways plan. **A.1**

6. Mitigation number 43, page V.E.26, calls for the construction of four pedestrian bridges in the South of Market area. Where proposed bridges would require connections with privately-owned parcels, provisions should be made allowing reductions in open space and public art requirements. **E.5** **A.1** **E.5**

7. Proposed mitigation measures 44 and 45 on page V.E.27 should include incentives for developers wishing to improve or develop pedestrian networks, streets and alleys identified in the Downtown Plan. Incentives could include partial or total satisfaction of open space and public art requirements in exchange for off-site improvements per the provisions for pedestrian networks, streets and alleys. **A.1** **E.5**

8. Mitigation measure 47, page V.E.28, would "permit or require developers to make cash payments (to a public agency) in-lieu of providing on-site parking." This measure is recommended as a means to finance construction of new long-term parking garages adjacent to the Downtown Plan Study area (as per mitigation number 30, page V.E.20 of the DEIR). **E.6.4**

A proposal for a required in-lieu cash payment is de facto taxation and of questionable validity under the California State Constitution (as amended by State Proposition 13, passed by the California voters in 1978). **E.6.4**

To construct parking facilities proposed by the Downtown Plan the Parking Authority should be the responsible agency to undertake this task. Chapter 17 of the San Francisco Administrative Code establishes a Parking Authority pursuant to the California Streets and Highway Code, section 32501. The Parking Authority is authorized to issue revenue bonds, acquire property, sell property, construct parking facilities and public rights-of-way, and to administer facilities to be used as off-street parking lots and garages. **Z.1**

An alternative financing mechanism could be to allow ground floor retail use in new long-term parking facilities. Lease revenues so derived could service a portion of the revenue bond debt. Also, the City should explore a commuter "park and ride" ticket which could be used to provide peak period shuttle or private jitney service to the downtown area. Finally, special attention should be given to siting potential peripheral long-term parking sites along proposed LRV lines. **E.4.1** **E.6**

10. To accommodate year 2000 peak-period transit commute growth projections, the EIR notes that Five-Year plans for regional transportation carriers must be implemented. **E.2.1.1**

Regarding MUNI, an evaluation of the Municipal Railway's "bus operator hours of duty" should be undertaken to determine whether greater operating efficiencies can be achieved during peak-period. The San Francisco Charter (Part V, Section 8.450) currently defines hours of duty as "eight basic hours of labor to be completed within ten consecutive hours." The question which should be answered is; what relation exists between duty hour requirements and MUNI's low vehicle peak-to-base service ratio? **E.6.2.1**

The low ratio could mean that off-peak MUNI service is too high or that peak service is too low. In either case, a more efficient deployment of duty hours could result in greater peak-hour capacity without significant additional committment of resources. E.6.2.1

Architectural/Historic Resources And Urban Design

1. Proposed mitigation measure 6 on page V.H.2 proposes that architecturally significant interiors be considered as criteria for categories of high significance in the designation of historic buildings. C.2.1

Article 10, landmark designation standards should be established to define and evaluate interior space proposed as significant. Evaluation criteria should include a definition of interior space and whether interior is confined to a building's lobby area. Preserva-tion of significant interiors should not preclude adaptive reuse and maintenance of economic utility. C.2.1

2. Mitigation 9, page V.H.2, calls for conformance to national rehabilitation standards in order to maintain National Register eligibility and maximum tax benefits for rehabilitation of buildings identified in the Downtown Plan as significant. C.2.2

This mitigation should be permissive and extended to building owners as an alternative, not a requirement. Discretionary review by City staff and decision makers should be sensitive to maintaining the economic utility of rehabilitated structures. C.2.2

3. Mitigation 11, page V.H.2, recommends that the Landmarks Preservation Advisory Board (LPAB) be strengthened and its role clarified.

Article 10 of the San Francisco Planning code identifies the role of LPAB as a information and advisory body to the Planning Commission and Board of Super-visors. LPAB's role should remain that of an advisory body, however its scope of project evaluation should now be modified to include a detailed economic analysis in cases where rehabilitation recommendations are proposed by LPAB staff and board members. C.2.3 Z.1

4. Mitigation measure 12, page V.H.3, would provide the Planning Commission authority to deny demolition or inappropriate alteration to landmarks, and provide authority to designate interior spaces significant on the basis of either architectural elements or historic events. C.2.1 C.2.2

Preservation of interior space should be limited to physical interiors having significant architectural features directly contributing to the structure (see comment number one of this section). Preservation of significant interiors should be tied to an economically feasible post-rehabilitation use. Examples of both economic and architecturally successful rehabilitations include the Palace Hotel's Garden Court and the Union Bank in the Merchants Exchange Building. C.2.1

5. Mitigation number 14, page V.H.3.
In addition to measures identified for this mitigation, the city should establish a standardized form for conveyance of development rights transfer (TDRs). Approval for this form by the City Attorney should occur/commence upon the sale of TDRs. C.2.3 Z.1

6. Mitigation number 17, page V.H.3.
The proposed mitigation measure should not be implemented until the need for such a program is demonstrated. Prior to implementing the proposed mitigation, a waiting C.2.2

period from six to twelve months should be observed. **C.2.2**

7. Mitigation number 2, page V.H.4.
The proposed mitigation refers to an "advisory board suggested in 2 above". Please identify and explain the role of this proposed body. In order to streamline the review process for the proposed FAR bonus (streetscape improvement), the Planning Commission should be the sole decision making body to approve improvements. All other departments, commissions and agencies should remain advisory to the Planning Commission. **H.2**

Wind, Sun and Shadow

1. Mitigation measure number 1, page V.H.4 notes that the eight mile-per-hour wind impact criterion for the Downtown Plan "does not specify the applicable direction, time of day, or whether the criterion represents an average speed or some other statistical parameter." In addition to this concern, a review of the eight mile-per-hour criterion should be undertaken. The following question must be answered; is this criterion realistic given the fact that the average San Francisco windspeed exceeds ten miles-per-hour from May through September? The criterion should at a minimum, be set in excess of thirteen miles-per-hour, since this represents a greater relative impact to pedestrians as described per Table 10, page 98 of the Downtown Plan. **H.3.2**

Skyline Image

Table V.H.1 evaluates proposed performance design criteria effectiveness to mitigate impacts to the City skyline image.

Consideration should also be given to increasing building height limits within selected areas of the C-3-0 districts. Particular attention should be directed to the C-3-0 (SD) district. Selectively increasing building heights could reduce the existing benching effect of development when viewed from south of the James Lick Skyway. This measure would also increase the demand for TDRs and is consistent with recommendations of the EIR consultant (see page V.B.5.) **H.4.1**

Open Space

The consultant should undertake a analysis of the Open Space Acquisition and Park Renovation Fund, which is administered by the Recreation and Parks Commission. This analysis should identify the incremental portion of revenues for the open space fund derived from commercial development in the C-3 districts which could be earmarked for acquisition and development of parks within those districts. Revenues so earmarked may already be sufficient to substantially reduce the open space requirements, particularly, an in-lieu contribution to acquire areas off of the developers site. **B.6**

Seismic Safety

The San Francisco Chamber of Commerce Codes Committee support efforts to strengthen the seismic safety section of the 1979 Uniform Building Code for new downtown construction in San Francisco, and the business community continues to work closely with the Mayor's Office of Emergency Services for the development of evacuation and emergency response plans. These plans are developed to provide for the safe evacuation of building occupants in the event of an emergency, and are reviewed and approved by the Office of Emergency Service. Emergency response plans are implemented by building management. All emergency planning activity is finalized prior to issuance by the Department of Public Works of final building permits. The Chamber has also assisted in negotiating an agreement with Bay Area ferry services to transport key San Francisco emergency response personnel to the City in the event of forced closings of transbay bridge and surface transportation routes. **K.1** **K.5**

Thank you for considering our comments.
Sincerely,

Richard B. Morten

Richard B. Morten
Associate Director, Planning

cc: Dean Macris
George Williams
Alec Bash
Paul Zigman

FILE NO. 58-84-24

(NEW CONDOMINIUM)

APPROVING MAP OF VILLA DORADO CONDOMINIUMS IN ASSESSOR'S BLOCK NO. 3283, A CONDOMINIUM SUBDIVISION.

MOVED, That the certain map entitled, "Map of Villa Dorado Condominiums, A Condominium, San Francisco, California", comprising 8 sheets, approved the 7th day of September, 1984, by Department of Public Works Order No. 133,982, be and the same is hereby approved and adopted as the official map of Villa Dorado Condominiums in Assessor's Block No. 3283, a condominium subdivision.

FURTHER MOVED, That certain cashier's check on file in the City Engineer's office in the sum of $3,801.96, conditioned for the payment of all taxes or special assessments collected as taxes which are, at the time of filing said map, a lien against the subdivision but not yet payable, be and the same is hereby approved and accepted.

FURTHER MOVED, That approval of this map is contingent upon compliance by the subdivider with all applicable provisions of the Subdivision Code of the City and County of San Francisco and amendments thereto.

RECOMMENDED:

Director of Public Works

DESCRIPTION APPROVED:

City Engineer

APPROVED:

Chief Administrative Officer

Adopted - Board of Supervisors, San Francisco September 17, 1984

Ayes: Supervisors Britt Hongisto Kennedy Kopp Maher Molinari
Nelder Renne Silver Walker

Absent: Supervisor~~s~~ Ward

I hereby certify that the foregoing motion was adopted by the Board of Supervisors of the City and County of San Francisco

John L. Taylor
Clerk

File No.
58-84-24

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